

Ann Arbor Laboratories
Pfizer Inc
2800 Plymouth Road
Ann Arbor, MI 48105
Tel 734 622 2295 Fax 734 622 4912



Global Research & Development

March 4, 2004

Ms. Carrie Monosmith
Michigan Department of Environmental Quality
Air Quality Division
State Office Building, 4th Floor
301 E. Louis B. Glick Highway
Jackson, MI 49201-1556

RECEIVED

MAR 09 2004

AIR ENFORCEMENT BRANCH
U.S. EPA, REGION 5

RE: ROP Semi-Annual, Annual and Other Report Certifications – SRN: B2328
Pfizer Global Research and Development (PGRD)

Dear Ms. Monosmith

Enclosed please find the ROP Report Certifications for the semi-annual report, annual compliance report and other reports (i.e., deviation, semi-annual fuel oil certification and 2003 MAERS). A separate Report Certification has been provided for the 2003 MAERS report. No deviations were noted for the semiannual period of July 1 to December 31, 2003. The annual compliance certification refers only to deviations previously submitted to the MDEQ on September 10, 2003. A copy of the deviation report and certification are attached. During this reporting period, PGRD provided a Rule 215 change notification on August 13, 2003 for permanent shut down and decommissioning of EUCOMBUSTOR. Beginning the week of August 25, the unit was dismantled with removal of burners, disconnection of all utilities (natural gas, electric, water) and removal of stack, rendering it non-operational.

Please feel free to contact me at 734-622-2295 with any questions regarding the enclosed reports.

Sincerely,
PGRD Michigan Laboratories (Ann Arbor Site)

A handwritten signature in cursive script, appearing to read "Kimberly Alfonsi".

Kimberly Alfonsi, CHMM
Associate Director, Environmental Affairs

cc: R. Davis – PGRD Global EHS
M. Mahoney – CEHS
M. Lemon - PGRD Michigan EHS
USEPA – Air Compliance Data – Michigan, Air and Radiation Division



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT
REPORT CERTIFICATION**

Authorized by 1994 P A 451, as amended Failure to provide this information may result in civil and/or criminal penalties

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating (RO) Permit program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as described in General Condition No. 22 in the RO Permit and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name Pfizer Global Research and Development County Washtenaw
Source Address 2800 Plymouth Road & 1600 Huron Parkway City Ann Arbor
AQD Source ID (SRN) B2328 RO Permit No 199700028 RO Permit Section No NA

Please check the appropriate box(es)

☒ **Annual Compliance Certification (General Condition No. 28 and No. 29 of the RO Permit)**

Reporting period (provide inclusive dates): From 01/01/03 To 12/31/03

- ☐ 1 During the entire reporting period, this source was in compliance with **ALL** terms and conditions contained in the RO Permit, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the RO Permit.
- ☒ 2 During the entire reporting period this source was in compliance with all terms and conditions contained in the RO Permit, each term and condition of which is identified and included by this reference, **EXCEPT** for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the RO Permit, unless otherwise indicated and described on the enclosed deviation report(s).

☒ **Semi-Annual (or More Frequent) Report Certification (General Condition No. 23 of the RO Permit)**

Reporting period (provide inclusive dates) From 07/01/03 To 12/31/03

- ☒ 1. During the entire reporting period, **ALL** monitoring and associated recordkeeping requirements in the RO Permit were met and no deviations from these requirements or any other terms or conditions occurred.
- ☐ 2 During the entire reporting period, all monitoring and associated recordkeeping requirements in the RO Permit were met and no deviations from these requirements or any other terms or conditions occurred, **EXCEPT** for the deviations identified on the enclosed deviation report(s).

☒ **Other Report Certification**

Reporting period (provide inclusive dates) From 07/01/03 To 12/31/03

Additional monitoring reports or other applicable documents required by the RO Permit are attached as described:

Semi-Annual Report of Fuel Oil Certifications dated March 4, 2004

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

Dr. David Canter Senior Vice President, PGRD 734-622-7000
Name of Responsible Official (print or type) Title Phone Number
Dr. David Canter 4 March 04
Signature of Responsible Official Date



Global Research & Development

September 10, 2003

Ms. Carrie Monosmith
Michigan Department of Environmental Quality
Air Quality Division
State Office Building, 4th Floor
301 E. Louis B. Glick Highway
Jackson, MI 49201-1556


RE: ROP Semi-Annual and Other Report Certifications – SRN: B2328
Pfizer Global Research and Development (PGRD)

Dear Ms. Monosmith

Enclosed please find the ROP Report Certification for the semi-annual report and other reports (i.e., deviation and semi-annual fuel oil certification). During this reporting period, PGRD also provided a Rule 215 change notification on April 30, 2003 regarding removal of the EUCCOLDCLEANER and replacement with a unit that does not use volatile organic solvents. This unit has been removed from the site. In addition, PGRD provided a Rule 215 change notification on August 13, 2003 for permanent shut down and decommissioning of EUCOMBUSTOR. During the week of August 25, the unit was dismantled with removal of burners and disconnection of all utilities (natural gas, electric, water), rendering it non-operational.

Please feel free to contact me at 734-622-2295 with any questions regarding the enclosed reports.

Sincerely,
PGRD Ann Arbor Laboratories


Kimberly Alfonsi, CHMM
Senior Environmental Manager

cc: R. Davis – PGRD Global EHS
M. Mahoney - CEHS



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT
REPORT CERTIFICATION**

Authorized by 1994 P A 451, as amended Failure to provide this information may result in civil and/or criminal penalties

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating (RO) Permit program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as described in General Condition No. 22 in the RO Permit and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name Pfizer Global Research and Development County Washtenaw
Source Address 2800 Plymouth Road & 1600 Huron Parkway City Ann Arbor
AQD Source ID (SRN) B2328 RO Permit No 199700028 RO Permit Section No NA

Please check the appropriate box(es):

☐ **Annual Compliance Certification** (General Condition No. 28 and No. 29 of the RO Permit)

Reporting period (provide inclusive dates) From _____ To _____

- ☐ 1 During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the RO Permit, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the RO Permit.
- ☐ 2. During the entire reporting period this source was in compliance with all terms and conditions contained in the RO Permit, each term and condition of which is identified and included by this reference, EXCEPT for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the RO Permit, unless otherwise indicated and described on the enclosed deviation report(s).

☒ **Semi-Annual (or More Frequent) Report Certification** (General Condition No. 23 of the RO Permit)

Reporting period (provide inclusive dates): From 01/01/2003 To 06/30/2003

- ☐ 1 During the entire reporting period, ALL monitoring and associated recordkeeping requirements in the RO Permit were met and no deviations from these requirements or any other terms or conditions occurred.
- ☒ 2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the RO Permit were met and no deviations from these requirements or any other terms or conditions occurred, EXCEPT for the deviations identified on the enclosed deviation report(s).

☒ **Other Report Certification**

Reporting period (provide inclusive dates): From 01/01/2003 To 06/30/2003

Additional monitoring reports or other applicable documents required by the RO Permit are attached as described:

Deviation Report for 01/01/2003 through 06/30/2003

Semi-Annual Report of Fuel Oil Certifications Dated September 10, 2003

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

Dr. David Canter Senior Vice President, PGRD 734-622-7000
Name of Responsible Official (print or type) Title Phone Number

David Canter
Signature of Responsible Official

10 Sept 2003
Date



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT
DEVIATION REPORT**

Authorized by 1994 P A 451, as amended Failure to provide this information may result in civil and/or criminal penalties

This form may be submitted in conjunction with the Renewable Operating Permit Report Certification form (EQP 5736) to report deviations from all general conditions and special conditions in the Renewable Operating (RO) Permit for which deviations required to be reported by Rule 213(3)(c) have occurred. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as described in General Condition No. 22 in the RO Permit and be made available to the Department of Environmental Quality, Air Quality Division, upon request. Items 1 - 8 must be completed for all deviations being reported.

Source Name Pfizer Global Research & Development County Washtenaw

Source Address 2800 Plymouth Road City Ann Arbor

AQD Source ID (SRN) B2328 RO Permit No. 199700028 RO Permit Section No. NA

RO Permit Section Contact Mr. Michael Lemon Contact Phone No. 734-622-3059

Reporting Period (provide inclusive dates) From January 1, 2003 to June 30, 2003

Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID EUCOMBUSTOR	2. Table/Condition No E-1.1/V.	3. Date(s) of Occurrence 01/18/03&03/22/03	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation See attached
6. Method Used to Determine Compliance Status (if different from method specified in RO Permit)		7. Description of Deviation Low hearth temperatures noted on temperature circular chart recorder (see attached)		
8. Reason for Deviation and Description of Corrective Action Taken Cause not determined. Corrective action included training review on operation. See attached for additional information.				

1. Group or Source Wide ID EUCOMBUSTOR	2. Table/Condition No E-1.1/V	3. Date(s) of Occurrence 2/8/03 - 2/13/03	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation See attached
6. Method Used to Determine Compliance Status (if different from method specified in RO Permit)		7. Description of Deviation Lower hearth temperatures recorded on temperature circular chart recorder (see attached)		
8. Reason for Deviation and Description of Corrective Action Taken One of three burners was not firing to boost hearth temperatures to typical operating levels. See attached for additional information. Corrective action included repair of controller and operator training.				

1. Group or Source Wide ID	2. Table/Condition No	3. Date(s) of Occurrence	4. Previously reported ? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date	5. Duration of Deviation
6. Method Used to Determine Compliance Status (if different from method specified in RO Permit)		7. Description of Deviation		
8. Reason for Deviation and Description of Corrective Action Taken				

Attachment to Deviation Report for 1/1/03 – 6/30/2003

PGRD Ann Arbor Laboratories

Corrective actions for the operational issues for EUCOMBUSTOR summarized below included 1) revision and enhancement of written standard operating procedures (SOPs); 2) additional training of personnel operating the equipment; and 3) review of incidents with supervisors to ensure SOPs were clearly understood. A review to identify any different or additional administrative or systems controls was discontinued following a business decision to permanently cease unit operation due to high utility and operating costs. The unit was permanently dismantled beginning on August 25, 2003.

Lower Operating Temperature with No Identifiable Cause

January 18, 2003

Lower operating temperatures of 400 to 500° F over an 8-hour period were noted on the chart recorder. Light throughput of approximately 275 lbs of pathological waste was recorded during that 8-hour period. There were no reports of abnormal conditions, maintenance requests or service for this day. No visible emissions or odors were reported on this day. The operating temperature range appears typical on January 19, 2003 without any maintenance or repair. It is unclear whether the temperature was actually low or whether the ink pen on the chart recorder malfunctioned.

March 22, 2003

Lower operating temperatures of 500 to 700° F over a 13-hour period were noted on the chart recorder. Throughput of approximately 750 lbs of pathological waste was recorded during that 13-hour period. There were no reports of abnormal conditions, maintenance requests or service for this day. No visible emissions or odors were reported on this day. The operating temperature range appears typical on March 23, 2003 without any maintenance or repair. It is unclear whether the temperature was actually low or whether the ink pen on the chart recorder malfunctioned.

Lower Operating Temperatures Due to Burner Malfunction

February 8 through February 13, 2003

On February 13, Animal Care staff observed that the hearth temperature was lower than typically observed. Powerhouse personnel were contacted and determined that although burners #1 and #2 were operating, burner #3 in the primary chamber was not staying lit. Environmental Affairs became aware of the operational issue and proceeded outside to observe the stack. No visible emissions were observed at approximately 11:45 when the hearth temperature was less than 900°F. Although the hearth temperature was rising, Animal Care personnel were instructed by Environmental Affairs to discontinue loading of material into the unit until given clearance by powerhouse personnel that all burners were completely operational. On February 14, operation resumed following maintenance with replacement of the amplifier on the burner controller.

A review of the temperature chart indicates intermittently lower hearth temperatures observed on February 8 through 12 that may be related to the burner #3 performance. No reports of visible emissions or odors were noted during this period.



Global Research & Development

March 4, 2004

Ms. Carrie Monosmith
Michigan Department of Environmental Quality
Air Quality Division
State Office Building, 4th Floor
301 E. Louis B. Glick Highway
Jackson, MI 49201

**RE: Fuel Oil Certification Report - Period Covering 7/1/2003 through 12/31/2003
Pfizer Global Research and Development, Ann Arbor, Michigan – SRN: B2328**

Dear Ms. Monosmith,

Under our renewable operating permit (199700028), issued November 21, 2002, Pfizer Global Research and Development (PGRD) must submit semi-annual reports of fuel oil certifications for fuel oil combusted for the powerhouse boilers and cogeneration turbine. The New Source Performance Standards for boilers (40 CFR 60 Subpart Dc) allows for either fuel oil testing or vendor certification to demonstrate compliance with the sulfur content limit.

During this reporting period, several shipments of No.2 fuel oil were delivered to the Ann Arbor Laboratories to power generators needed during the Multi-State Power Outage beginning August 14, 2003. No. 2 fuel oil was received from three companies, Caywood Oil and Gas Company, G.E. Wacker, and Corrigan Oil Company. Following refueling of generators, the remainder of two fuel oil shipments from Wacker and Corrigan was deposited into the 50,000 gallon storage tank used for the Powerhouse boilers. No deliveries were made to the 25,000 gallon tank for EUTURBINE during this semi-annual period.

All No. 2 fuel oil delivered to the Pfizer Ann Arbor Laboratories on August 14-17, 2003 met ASTM D-396 specifications. Fuel oil delivered by G.E. Wacker and Caywood Oil and Gas Company had a maximum sulfur content of 0.05% by weight. Fuel oil delivered by Corrigan Oil Company had a maximum sulfur content of 0.5% by weight. Sulfur content was determined per ASTM D-4294 for fuel oil deliveries by all three companies. Certifications and MSDSs for fuel oil from each of the three fuel oil companies are attached.

Since approximately 1,000 gallons of high sulfur fuel oil was placed in the 50,000 gallon storage tank after refueling site generators, two fuel oil samples from the tank were obtained on August 21, 2003 to confirm sulfur content below permit limits prior to any usage by the boilers. Both samples contained 0.042% sulfur by weight by ASTM-4294, confirming the sulfur content for the tank below the permit limits of 0.1% or 0.05% sulfur for the boilers.

To: Ms. Carrie Monosmith

March 4, 2004

Page 2

Therefore, all #2 fuel oil combusted by PGRD boilers met ASTM D-396 specifications and had a maximum sulfur content of 0.05% sulfur by weight. Thus, PGRD is in compliance with fuel oil sulfur content limits for EUTURBINE, FGBOILERS2&3, FGBOILERS5&6, FG BOILERS1A and 1B. No excess emissions reports are required for these units during this reporting period.

If you have any questions, please contact me at (734) 622-2295.

Sincerely,

Pfizer Global Research and Development

A handwritten signature in black ink, appearing to read "Kimberly Alfonsi".

Kimberly Alfonsi, CHMM

Associate Director, Environmental Affairs

cc: R. Davis – Global EHS
M. Mahoney - CEHS

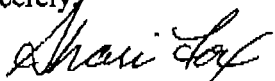
September 18, 2003

Kim Alfonsi
Senior Manager, Environmental Affairs
Pfizer Global Research and Development
2800 Plymouth Road
Ann Arbor, MI 48105

Ms. Alfonsi:

The fuel oil delivered to the Pfizer Inc Ann Arbor Laboratories on August 14 – 17, 2003 was all No. 2 Fuel Oil per ATSM D396 (distillate oil). The No. 2 Fuel Oil had a maximum sulfur content of .05 % by weight as tested per ASTM D-4294.

Sincerely,



Shari Fox
Company Representative

Caywood Oil & Gas, LLC
Company Name

FAX COVER

DATE: 9-25-03

FROM. CAYWOOD PROPANE GAS, INC.

TO: Beth Nothstine

OF PAGES 1/2

COMMENTS:



MATERIAL SAFETY DATA SHEET

PAGE 2 OF

PRODUCT NAME: MAPLLC NO. 2 FUEL OIL DYED (0.05% SULFUR MAX)
MSDS NO: 0117MAR019

2. COMPOSITION / INFORMATION ON INGREDIENTS (CON'T)

EXPOSURE GUIDELINES

LIMIT

TYPE

SOURCE

COMPONENTS:

SATURATED HYDROCARBONS

NONE ESTABLISHED

AROMATIC HYDROCARBONS

NONE ESTABLISHED

UNSATURATED HYDROCARBONS

NONE ESTABLISHED

3. HAZARDS IDENTIFICATION

***** EMERGENCY OVERVIEW *****

NO. 2 FUEL OIL DYED IS A RED COLORED LIQUID. NO. 2 FUEL OIL IS CONSIDERED TO BE A COMBUSTIBLE LIQUID PER THE OSHA HAZARD COMMUNICATION STANDARD AND SHOULD BE KEPT AWAY FROM HEAT, FLAME AND SOURCES OF IGNITION. NEVER SIPHON THIS PRODUCT BY MOUTH. IF SWALLOWED, FUEL OIL MAY GET SUCKED INTO THE LUNGS (ASPIRATED) AND CAUSE LUNG DAMAGE OR EVEN DEATH. PROLONGED OR REPEATED SKIN CONTACT CAN CAUSE DEFATTING AND DRYING OF THE SKIN WHICH MAY PRODUCE SEVERE IRRITATION OR DERMATITIS.

OSHA WARNING LABEL:

WARNING!

COMBUSTIBLE LIQUID.

ASPIRATION (INADVERTENT SUCTION) OF LIQUID INTO THE LUNGS
CAN PRODUCE CHEMICAL PNEUMONIA OR EVEN DEATH.
PRODUCES SKIN IRRITATION UPON PROLONGED OR REPEATED CONTACT.

POTENTIAL HEALTH EFFECTS

EYE:

PRODUCES LITTLE OR NO IRRITATION ON DIRECT CONTACT WITH THE EYE.

SKIN:

PROLONGED AND REPEATED LIQUID CONTACT CAN CAUSE DEFATTING AND DRYING OF THE SKIN WHICH MAY PRODUCE SEVERE IRRITATION OR DERMATITIS.

INHALATION:

HIGH VAPOR CONCENTRATIONS MAY PRODUCE HEADACHE, GIDDINESS, VERTIGO, AND ANESTHETIC STUPOR.



MATERIAL SAFETY DATA SHEET

PAGE

PRODUCT NAME: MAPLLC NO. 2 FUEL OIL DYED (0.05% SULFUR MAX)
MSDS NO: 0117MAR019

THE FOLLOWING INFORMATION IS FURNISHED SUBJECT TO THE DISCLAIMER ON THE BOTTOM OF THIS

1. CHEMICAL PRODUCT AND COMPANY INFORMATION

PRODUCT
NAME: MAPLLC NO. 2 FUEL OIL DYED (0.05% SULFUR MAX)

MANUFACTURER / DISTRIBUTOR:
MARATHON ASHLAND PETROLEUM L.
539 SOUTH MAIN STREET
FINDLAY OH 45840

SYNONYMS:

D-GRADE DYED NO. 2 DIESEL FUEL; DIESEL #2
DYED (0.05 SULFUR MAX); LOW SULFUR NO. 2
DIESEL FUEL DYED; LOW SULFUR NO. 2 FUEL OIL
DYED; MAPLLC NO. 2 FUEL OIL DYED (0.05%
SULFUR MAX); NO. 2 DIESEL FUEL DYED 0.05
SULFUR MAX; NO. 2 FUEL OIL DYED 0.05 SULFUR
MAX

EMERGENCY PHONE NUMBERS:
(877) 627-5463
(800) 424-9300

CHEMICAL FAMILY: PETROLEUM HYDROCARBON
CHEMICAL FORMULA: MIXTURE
PRODUCT CODE: NONE

MSDS INFORMATION: (419) 421-30

MSDS REVISION DATE: 07/28/1998

INFORMATION SUPPLIED BY: CRAIG M. PARKER
MANAGER, TOXICOLOGY AND PRODUCT SAFETY

2. COMPOSITION / INFORMATION ON INGREDIENTS

PRODUCT INFORMATION:

MAPLLC NO. 2 FUEL OIL DYED (0.05% SULFUR MAX) (CAS # 68476-30-2) IS A/AN
COMPLEX MIXTURE OF PARAFFINS, CYCLOPARAFFINS, OLEFINS AND AROMATIC
HYDROCARBONS HAVING HYDROCARBON CHAIN LENGTHS PREDOMINANTLY IN THE
RANGE OF C11 THROUGH C20. IT CONTAINS MINOR AMOUNTS OF SULFUR (<0.05%).
MAY CONTAIN A TRACE AMOUNT OF BENZENE (<0.01%).
*** CAN CONTAIN SMALL AMOUNTS OF RED DYE AND OTHER ADDITIVES (>0.15%)
WHICH ARE NOT CONSIDERED HAZARDOUS AT THE CONCENTRATIONS USED.

COMPONENTS:	PERCENT RANGE	CAS NUMBER
SATURATED HYDROCARBONS (PARAFFINS AND CYCLOPARAFFINS)	54.00- 85.00	MIXTURE
AROMATIC HYDROCARBONS	15.00- 45.00	MIXTURE
UNSATURATED HYDROCARBONS (OLEFINS)	1.00- 6.00	MIXTURE

EXPOSURE GUIDELINES

LIMIT	TYPE	SOURCE
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PRODUCT:

MAPLLC NO. 2 FUEL OIL DYED (0.05% SULFU- NONE ESTABLISHED
R MAX)

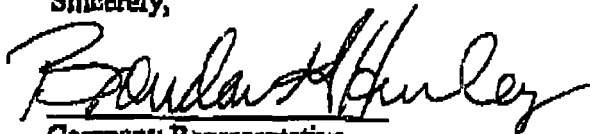
September 18, 2003

Kim Alfonsi
Senior Manager, Environmental Affairs
Pfizer Global Research and Development
2800 Plymouth Road
Ann Arbor, MI 48105

Ms. Alfonsi:

The fuel oil delivered to the Pfizer Inc Ann Arbor Laboratories on August 14 - 17, 2003 was all No. 2 Fuel Oil per ASTM D396 (distillate oil). The No. 2 Fuel Oil had a maximum sulfur content of 5 % by weight as tested per ASTM D-4294.

Sincerely,



Company Representative

Cornigan Oil Co No II
Company Name



MARATHON ASHLAND
Petroleum LLC

MATERIAL SAFETY DATA SHEET

Cerrigan Oil

PAGE 1 OF 10

PRODUCT NAME: MAPLLC NO. 2 FUEL OIL DYED (0.5% SULFUR MAX)
MSDS NO: 0118MAR019

THE FOLLOWING INFORMATION IS FURNISHED SUBJECT TO THE DISCLAIMER ON THE BOTTOM OF THIS FORM

1. CHEMICAL PRODUCT AND COMPANY INFORMATION

PRODUCT
NAME: MAPLLC NO. 2 FUEL OIL DYED (0.5% SULFUR MAX)

MANUFACTURER / DISTRIBUTOR:
MARATHON ASHLAND PETROLEUM LLC
539 SOUTH MAIN STREET
FINDLAY OH 45840

SYNONYMS:

DIESEL #2 DYED (0.5 SULFUR MAX); HIGH SULFUR
DYED NO. 2 DIESEL FUEL, MAPLLC; HIGH SULFUR
DYED NO. 2 FUEL OIL, MAPLLC; MAPLLC NO. 2
FUEL OIL DYED (0.5% SULFUR MAX);
MULTIPURPOSE NO. 2 DIESEL FUEL DYED; NO. 2
DIESEL FUEL DYED .5 SULFUR MAX; NO. 2
DISTILLATE FUEL DYED .5 SULFUR MAX; NO. 2
FUEL OIL DYED .5 SULFUR MAX

EMERGENCY PHONE NUMBERS:
(877) 627-5463
(800) 424-9300

CHEMICAL FAMILY: PETROLEUM HYDROCARBON
CHEMICAL FORMULA: MIXTURE
PRODUCT CODE: NONE

MSDS INFORMATION: (419) 421-3070

MSDS REVISION DATE: 07/28/1998

INFORMATION SUPPLIED BY: CRAIG M. PARKER
MANAGER, TOXICOLOGY AND PRODUCT SAFETY

2. COMPOSITION / INFORMATION ON INGREDIENTS

PRODUCT INFORMATION:

MAPLLC NO. 2 FUEL OIL DYED (0.5% SULFUR MAX) (CAS # 68476-30-2) IS A/AN
COMPLEX MIXTURE OF PARAFFINS, CYCLOPARAFFINS, OLEFINS AND AROMATIC
HYDROCARBONS HAVING HYDROCARBON CHAIN LENGTHS PREDOMINANTLY IN THE
RANGE OF C11 THROUGH C20. CONTAINS MINOR AMOUNTS OF SULFUR (<0.5%).
MAY CONTAIN A TRACE AMOUNT OF BENZENE (<0.01%).

CAN CONTAIN SMALL AMOUNTS OF RED DYE AND OTHER ADDITIVES (>0.15%)
WHICH ARE NOT CONSIDERED HAZARDOUS AT THE CONCENTRATIONS USED.

COMPONENTS:

PERCENT RANGE

CAS NUMBER

SATURATED HYDROCARBONS
(PARAFFINS AND CYCLOPARAFFINS)

54.00- 85.00

MIXTURE

AROMATIC HYDROCARBONS

15.00- 45.00

MIXTURE

UNSATURATED HYDROCARBONS
(OLEFINS)

1.00- 6.00

MIXTURE

EXPOSURE GUIDELINES

LIMIT

TYPE

SOURCE

PRODUCT:

MAPLLC NO. 2 FUEL OIL DYED (0.5% SULFUR-
MAX) NONE ESTABLISHED

775 NORTH SECOND STREET
BRIGHTON MI 48116
810.229.6323 PHONE
810.229.4970 FAX

CORRIGAN OIL CO.

Fax

To: Beth-Pfizer From: Heather Kennedy
Fax: 646-441-5725 Pages: 11 , includes fax cover
Phone: 734-622-1482 Date: 8/19/03
Re: MSDS CCI

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

• Comments:

MSDS Requested
- High Sulfur Diesel

Beth,

Any questions, please
do not hesitate to contact
me.

Thank You
Heather



MARATHON ASHLAND
Polymers LLC

MATERIAL SAFETY DATA SHEET

PAGE 2 OF 10

PRODUCT NAME: MAPLLC NO. 2 FUEL OIL DYED (0.5% SULFUR MAX)
MSDS NO: 0118MAR019

2. COMPOSITION / INFORMATION ON INGREDIENTS (CON'T)

EXPOSURE GUIDELINES

LIMIT

TYPE

SOURCE

COMPONENTS:

SATURATED HYDROCARBONS
AROMATIC HYDROCARBONS
UNSATURATED HYDROCARBONS

NONE ESTABLISHED
NONE ESTABLISHED
NONE ESTABLISHED

3. HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

NO. 2 FUEL OIL DYED IS A RED COLORED LIQUID. NO. 2 FUEL OIL IS CONSIDERED TO BE A COMBUSTIBLE LIQUID PER THE OSHA HAZARD COMMUNICATION STANDARD AND SHOULD BE KEPT AWAY FROM HEAT, FLAME AND SOURCES OF IGNITION. NEVER SIPHON THIS PRODUCT BY MOUTH. IF SWALLOWED, FUEL OIL MAY GET SUCKED INTO THE LUNGS (ASPIRATED) AND CAUSE LUNG DAMAGE OR EVEN DEATH. PROLONGED OR REPEATED SKIN CONTACT CAN CAUSE DEFATTING AND DRYING OF THE SKIN WHICH MAY PRODUCE SEVERE IRRITATION OR DERMATITIS.

OSHA WARNING LABEL:

WARNING!

**COMBUSTIBLE LIQUID.
ASPIRATION (INADVERTENT SUCTION) OF LIQUID INTO THE LUNGS
CAN PRODUCE CHEMICAL PNEUMONIA OR EVEN DEATH.
PRODUCES SKIN IRRITATION UPON PROLONGED OR REPEATED CONTACT.**

POTENTIAL HEALTH EFFECTS

EYE:

PRODUCES LITTLE OR NO IRRITATION ON DIRECT CONTACT WITH THE EYE.

SKIN:

PROLONGED AND REPEATED LIQUID CONTACT CAN CAUSE DEFATTING AND DRYING OF THE SKIN WHICH MAY PRODUCE SEVERE IRRITATION OR DERMATITIS.

INHALATION:

HIGH VAPOR CONCENTRATIONS MAY PRODUCE HEADACHE, GIDDINESS, VERTIGO, AND ANESTHETIC STUPOR.



3. HAZARDS IDENTIFICATION (CON'T)

INGESTION MAY RESULT IN NAUSEA, VOMITING, DIARRHEA AND RESTLESSNESS. ASPIRATION (INADVERTENT SUCTION) OF LIQUID INTO THE LUNGS MUST BE AVOIDED AS EVEN SMALL QUANTITIES IN THE LUNGS CAN PRODUCE CHEMICAL PNEUMONITIS, PULMONARY EDEMA/HEMORRHAGE AND EVEN DEATH.

THE INTERNATIONAL AGENCY FOR RESEARCH ON CANCER (IARC) HAS DETERMINED THAT THERE IS INADEQUATE EVIDENCE FOR THE CARCINOGENICITY OF FUEL OIL IN HUMANS.

IARC HAS DETERMINED THAT THERE IS SUFFICIENT EVIDENCE FOR THE CARCINOGENICITY IN EXPERIMENTAL ANIMALS OF WHOLE ENGINE EXHAUST AND EXTRACTS OF DIESEL ENGINE EXHAUST PARTICLES. IARC DETERMINED THAT THERE IS ONLY LIMITED EVIDENCE FOR THE CARCINOGENICITY IN HUMANS OF DIESEL ENGINE EXHAUST. HOWEVER, IARC'S OVERALL EVALUATION HAS RESULTED IN THE IARC DESIGNATION OF DIESEL ENGINE EXHAUST AS PROBABLY CARCINOGENIC TO HUMANS (GROUP 2A) BECAUSE OF THE PRESENCE OF CERTAIN ENGINE EXHAUST COMPONENTS.

PREEXISTING SKIN CONDITIONS AND RESPIRATORY DISORDERS MAY BE AGGRAVATED BY EXPOSURE TO COMPONENTS OF FUEL OILS.

FLUSH EYES WITH LARGE AMOUNTS OF WATER FOR AT LEAST 15 MINUTES. IF SYMPTOMS OR IRRITATION OCCUR, CALL A PHYSICIAN.

WASH WITH SOAP AND LARGE AMOUNTS OF WATER. REMOVE CONTAMINATED CLOTHING. IF SYMPTOMS OF IRRITATION OCCUR, CALL A PHYSICIAN.

IF AFFECTED, MOVE PERSON TO FRESH AIR. IF BREATHING IS DIFFICULT, ADMINISTER OXYGEN. IF NOT BREATHING OR NO HEARTBEAT, GIVE ARTIFICIAL RESPIRATION OR CARDIOPULMONARY RESUSCITATION (CPR). IMMEDIATELY CALL A PHYSICIAN.



MARATHON ASHLAND
Petroleum LLC

MATERIAL SAFETY DATA SHEET

PAGE 4 OF 10

PRODUCT NAME: MAPLLC NO. 2 FUEL OIL DYED (0.5% SULFUR MAX)
MSDS NO: 0118MAR019

4. FIRST AID MEASURES (CON'T)

INGESTION:

DO NOT INDUCE VOMITING. DO NOT GIVE LIQUIDS. IMMEDIATELY CALL A PHYSICIAN.

NOTES TO PHYSICIAN:

NO DATA AVAILABLE.

5. FIRE FIGHTING MEASURES

FLAMMABLE PROPERTIES:

FLASH POINT: 130-190 F
AUTOIGNITION TEMP: 637 F
EXPLOSIVE LIMITS (% BY VOLUME IN AIR)
LOWER: 0.7
UPPER: 5.0

FIRE AND EXPLOSION HAZARDS:

THIS PRODUCT HAS BEEN DETERMINED TO BE A COMBUSTIBLE LIQUID PER THE OSHA HAZARD COMMUNICATION STANDARD AND SHOULD BE HANDLED ACCORDINGLY. FOR ADDITIONAL FIRE RELATED INFORMATION, SEE NFPA 30 OR THE NORTH AMERICAN EMERGENCY RESPONSE GUIDE 128.

EXTINGUISHING MEDIA:

FOR SMALL FIRES, CLASS B FIRE EXTINGUISHING MEDIA SUCH AS CO2, DRY CHEMICAL, FOAM (AFFF/ATC) OR WATER SPRAY CAN BE USED. FOR LARGE FIRES, WATER SPRAY, FOG OR FOAM (AFFF/ATC) CAN BE USED. FIRE FIGHTING SHOULD BE ATTEMPTED ONLY BY THOSE WHO ARE ADEQUATELY TRAINED AND EQUIPPED WITH PROPER PROTECTIVE EQUIPMENT.

SPECIAL FIRE FIGHTING INSTRUCTIONS:

AVOID USE OF STRAIGHT WATER STREAMS. WATER SPRAY AND FOAM (AFFF/ATC) MUST BE APPLIED CAREFULLY TO AVOID FROTHING. AVOID EXCESSIVE APPLICATION. USE WATER SPRAY TO COOL EXPOSED SURFACES FROM AS FAR A DISTANCE AS POSSIBLE. KEEP RUN-OFF WATER OUT OF SEWERS AND WATER SOURCES.



MARATHON ASHLAND
Petroleum LLC

MATERIAL SAFETY DATA SHEET

PAGE 5 OF 10

PRODUCT NAME: MAPLLC NO. 2 FUEL OIL DYED (0.5% SULFUR MAX)
MSDS NO: 0118MAR019

6. ACCIDENTAL RELEASE MEASURES

ISOLATE AND EVACUATE AREA. SHUT OFF SOURCE IF SAFE TO DO SO. ELIMINATE ALL IGNITION SOURCES. ADVISE NATIONAL RESPONSE CENTER (800-424-8802) IF SUBSTANCE HAS ENTERED A WATERWAY. NOTIFY LOCAL HEALTH AND POLLUTION CONTROL AGENCIES, IF APPROPRIATE. CONTAIN LIQUID WITH SAND OR SOIL. RECOVER AND RETURN FREE LIQUID TO PROPER CONTAINERS. USE SUITABLE ABSORBENT MATERIALS SUCH AS VERMICULITE, SAND, OR CLAY TO CLEAN UP RESIDUAL LIQUIDS.

7. HANDLING AND STORAGE

COMPLY WITH ALL APPLICABLE OSHA, NFPA AND CONSISTENT LOCAL REQUIREMENTS. USE APPROPRIATE GROUNDING AND BONDING PRACTICES. STORE IN PROPERLY CLOSED CONTAINERS THAT ARE APPROPRIATELY LABELED AND IN A COOL, WELL-VENTILATED AREA. DO NOT EXPOSE TO HEAT, OPEN FLAME, STRONG OXIDIZERS OR OTHER SOURCES OF IGNITION. DO NOT CUT, DRILL, GRIND OR WELD ON EMPTY CONTAINERS SINCE THEY MAY CONTAIN EXPLOSIVE RESIDUES. AVOID REPEATED AND PROLONGED SKIN CONTACT. EXERCISE GOOD PERSONAL HYGIENE INCLUDING REMOVAL OF SOILED CLOTHING AND PROMPT WASHING WITH SOAP AND WATER. NEVER SIPHON THIS PRODUCT BY MOUTH.

8. EXPOSURE CONTROL / PERSONAL PROTECTION

ENGINEERING CONTROLS:

LOCAL OR GENERAL EXHAUST REQUIRED WHEN SPRAYING OR USING AT ELEVATED TEMPERATURES.

PERSONAL PROTECTIVE EQUIPMENT:

RESPIRATORY PROTECTION:

USE APPROVED ORGANIC VAPOR CHEMICAL CARTRIDGE OR SUPPLIED AIR RESPIRATORS WHEN MATERIAL PRODUCES VAPORS THAT EXCEED PERMISSIBLE LIMITS OR EXCESSIVE VAPORS ARE GENERATED. OBSERVE RESPIRATOR PROTECTION FACTOR CRITERIA CITED IN ANSI Z88.2. SELF-CONTAINED BREATHING APPARATUS SHOULD BE USED FOR FIRE FIGHTING.

SKIN PROTECTION:

NEOPRENE, NITRILE, POLYVINYL ALCOHOL (PVA), POLYVINYL CHLORIDE AND POLYURETHANE GLOVES TO PREVENT SKIN CONTACT.

PRODUCT NAME: MAPLLC NO. 2 FUEL OIL DYED (0.5% SULFUR MAX)
MSDS NO: 0118MAR019

8. EXPOSURE CONTROL / PERSONAL PROTECTION (CON'T)

EYE PROTECTION:

NO SPECIAL EYE PROTECTION IS NORMALLY REQUIRED. WHERE SPLASHING IS POSSIBLE, WEAR SAFETY GLASSES WITH SIDE SHIELDS.

OTHER PROTECTIVE EQUIPMENT:

NO SPECIAL PROTECTIVE CLOTHING IS NORMALLY REQUIRED. SELECT PROTECTIVE CLOTHING DEPENDING ON INDUSTRIAL OPERATIONS.

USE MECHANICAL VENTILATION EQUIPMENT THAT IS EXPLOSION-PROOF.

9. PHYSICAL AND CHEMICAL PROPERTIES

BOILING POINT:	400-640 F
MELTING POINT:	NO DATA AVAILABLE
SPECIFIC GRAVITY (H2O=1):	C.A. 0.8
PACKING DENSITY (KG/M3):	NO DATA AVAILABLE
% SOLUBILITY IN WATER:	NEGLIGIBLE
VAPOR DENSITY (AIR=1):	4-5
VAPOR PRESSURE:	1-10 MMHG @ 100 F
PH INFORMATION:	NO DATA AVAILABLE
% VOLATILES BY VOL:	NO DATA AVAILABLE
EVAPORATION RATE:	NO DATA AVAILABLE
APPEARANCE:	RED LIQUID
ODOR:	SLIGHT HYDROCARBON
ODOR THRESHOLD (PPM):	NO DATA AVAILABLE

ADDITIONAL PROPERTIES:

DENSITY: 6.76 LBS/GALLON
AVERAGE MOLECULAR WEIGHT: 180

10. STABILITY AND REACTIVITY

STABILITY:

THE MATERIAL IS STABLE AT 70 F, 760MM PRESSURE.

CONDITIONS TO AVOID:

EXCESSIVE HEAT, SOURCES OF IGNITION.

HAZARDOUS DECOMPOSITION PRODUCTS:

CARBON MONOXIDE, ALDEHYDES, AROMATIC, OTHER HYDROCARBONS.



MARATHON ASHLAND
Petroleum LLC

MATERIAL SAFETY DATA SHEET

PAGE 7 OF 10

PRODUCT NAME: MAPLLC NO. 2 FUEL OIL DYED (0.5% SULFUR MAX)
MSDS NO: 0118MAR019

10. STABILITY AND REACTIVITY (CON'T)

INCOMPATIBLE MATERIALS:

STRONG OXIDIZERS SUCH AS NITRATES, PERCHLORATES, CHLORINE, FLUORINE.

HAZARDOUS POLYMERIZATION:

WILL NOT OCCUR.

CONDITIONS TO AVOID:

NO DATA AVAILABLE.

ADDITIONAL COMMENTS:

NO DATA AVAILABLE.

11. TOXICOLOGICAL INFORMATION

LIFETIME SKIN PAINTING STUDIES IN ANIMALS WITH SIMILAR DISTILLATE FUELS HAVE PRODUCED WEAK TO MODERATE CARCINOGENIC ACTIVITY FOLLOWING PROLONGED AND REPEATED EXPOSURE. SIMILAR MIDDLE DISTILLATES, WHEN TESTED AT NONIRRITATING DOSE LEVELS, DID NOT SHOW ANY SIGNIFICANT CARCINOGENIC ACTIVITY INDICATING THAT THIS TUMORIGENIC RESPONSE IS LIKELY RELATED TO CHRONIC IRRITATION AND NOT TO DOSE. REPEATED DERMAL APPLICATION HAS PRODUCED SEVERE IRRITATION AND SYSTEMIC TOXICITY IN SUBACUTE TOXICITY STUDIES. SOME COMPONENTS OF DISTILLATE FUELS, I.E., PARAFFINS AND OLEFINS, HAVE BEEN SHOWN TO PRODUCE A SPECIES SPECIFIC, SEX HORMONAL DEPENDENT KIDNEY LESION IN MALE RATS FROM REPEATED ORAL OR INHALATION EXPOSURE. SUBSEQUENT RESEARCH HAS SHOWN THAT THE KIDNEY DAMAGE DEVELOPS VIA THE FORMATION OF ALPHA-2U-GLOBULIN, A MECHANISM UNIQUE TO THE MALE RAT. HUMANS DO NOT FORM ALPHA-2U-GLOBULIN, THEREFORE, THE KIDNEY EFFECTS RESULTING FROM THIS MECHANISM ARE NOT RELEVANT IN HUMANS. KEROSENE AND NO.1 FUEL OIL WERE FOUND TO BE POSITIVE IN A FEW MUTAGENICITY TESTS WHILE NEGATIVE IN THE MAJORITY OF OTHERS. THE EXACT RELATIONSHIP BETWEEN THESE RESULTS AND HUMAN HEALTH IS NOT KNOWN.

COMBUSTION OF KEROSENE AND/OR DIESEL FUELS PRODUCES GASES AND PARTICULATES WHICH INCLUDE CARBON MONOXIDE, CARBON DIOXIDE, OXIDES OF NITROGEN AND/OR SULFUR AND HYDROCARBONS. EXPOSURE TO HIGH CONCENTRATIONS OF CARBON MONOXIDE CAN CAUSE HYPOXIA VIA THE FORMATION OF CARBOXYHEMOGLOBIN. CHRONIC INHALATION STUDIES OF WHOLE DIESEL ENGINE EXHAUST IN MICE AND RATS PRODUCED A SIGNIFICANT INCREASE IN LUNG TUMORS.

12. ECOLOGICAL INFORMATION

LIQUID CAN BE TOXIC TO AQUATIC LIFE AND CAUSE FOULING OF THE SHORELINE AT HIGH CONCENTRATIONS. THE AQUATIC 24 HOUR TLM IS 2,990 PPM IN FRESHWATER BLUEGILL FISH. HOWEVER, KEROSENE AND FUEL OILS DO NOT BIOCONCENTRATE IN THE FOOD CHAIN. IF PRODUCT IS RELEASED TO SOIL OR WATER, IT IS EXPECTED TO BIODEGRADE UNDER BOTH AEROBIC AND ANAEROBIC CONDITIONS.

PRODUCT NAME: MAPLLC NO. 2 FUEL OIL DYED (0.5% SULFUR MAX)
MSDS NO: 0118MAR019

13. DISPOSAL CONSIDERATIONS

THIS PRODUCT AS PRODUCED IS NOT SPECIFICALLY LISTED AS AN EPA RCRA HAZARDOUS WASTE ACCORDING TO FEDERAL REGULATIONS (40 CFR 260-271). HOWEVER, WHEN DISCARDED OR DISPOSED OF, IT MAY MEET THE CRITERIA OF AN "IGNITABLE" HAZARDOUS WASTE. THIS MATERIAL COULD ALSO BECOME A HAZARDOUS WASTE IF MIXED OR CONTAMINATED WITH A LISTED HAZARDOUS WASTE. IT IS THE RESPONSIBILITY OF THE USER TO DETERMINE IF DISPOSAL MATERIAL IS HAZARDOUS ACCORDING TO FEDERAL, STATE AND LOCAL REGULATIONS.

14. TRANSPORTATION INFORMATION

49 CFR 172.101:

PROPER SHIPPING NAME:	FUEL OIL, NO. 2
DOT CLASSIFICATION:	3
DOT IDENTIFICATION NUMBER:	NA 1993
PACKING GROUP:	PG III

PRODUCT NAME: MAPLLC NO. 2 FUEL OIL DYED (0.5% SULFUR MAX)
MSDS NO: 0118MAR019

15. REGULATORY INFORMATION

THE FOLLOWING REGULATIONS APPLY TO THIS PRODUCT:

OSHA HAZARD COMMUNICATION STANDARD (29 CFR 1910.1200):

THIS PRODUCT HAS BEEN EVALUATED AND DETERMINED TO BE HAZARDOUS AS
DEFINED IN OSHA'S HAZARD COMMUNICATION STANDARD.

EPA TOXIC SUBSTANCES CONTROL ACT (40 CFR PART 710):

THIS PRODUCT AND/OR ITS COMPONENTS ARE LISTED ON THE TSCA CHEMICAL
INVENTORY.

EPA SARA TITLE III SUPERFUND AMENDMENTS & REAUTHORIZATION ACT - EMERGENCY
PLANNING & COMMUNITY RIGHT-TO-KNOW ACT OF 1986.

EXTREMELY HAZARDOUS SUBSTANCES (40 CFR PART 355):

THIS PRODUCT CONTAINS THE FOLLOWING COMPONENT(S) IDENTIFIED ON APPENDIX
A AND B OF THE EXTREMELY HAZARDOUS SUBSTANCE LIST (AT A LEVEL OF 1% OR
GREATER IF HAZARDOUS; 0.1% OR GREATER IF CARCINOGENIC): NONE.

EMERGENCY RELEASE NOTIFICATIONS (40 CFR PART 355):

THIS PRODUCT CONTAINS THE FOLLOWING COMPONENT(S) IDENTIFIED EITHER AS AN
EXTREMELY HAZARDOUS SUBSTANCE (40 CFR 355) OR A CERCLA HAZARDOUS
SUBSTANCE (40 CFR 302) WHICH IN CASE OF A SPILL OR RELEASE MAY BE
SUBJECT TO EMERGENCY RELEASE REPORTING REQUIREMENTS: NONE.

MATERIAL SAFETY DATA SHEET REQUIREMENTS (40 CFR PART 370):

THE FOLLOWING EPA HAZARD CATEGORIES APPLY TO THIS PRODUCT:

IMMEDIATE (ACUTE) HEALTH HAZARD
FIRE HAZARD

MSDS'S OR A LIST OF MSDS'S AND THEIR HAZARDS (SEE EPA HAZARD CATEGORIES
ABOVE) MAY BE REQUIRED TO BE SUBMITTED TO THE STATE EMERGENCY RESPONSE
COMMISSION (SERC), LOCAL EMERGENCY PLANNING COMMITTEE (LEPC) AND LOCAL
FIRE DEPARTMENT (LFD).

IN ADDITION, A TIER II OR TIER I FORM MAY BE REQUIRED TO BE SUBMITTED
ANNUALLY TO THE SERC, LEPC AND LFD IF APPLICABLE THRESHOLD REPORTING
QUANTITIES ARE EXCEEDED. CURRENT FEDERAL THRESHOLDS ARE:

10,000 POUNDS OR MORE OF AN OSHA HAZARDOUS SUBSTANCE
OR
500 POUNDS OR THE THRESHOLD PLANNING QUANTITY, WHICHEVER IS
LESS, OF AN EXTREMELY HAZARDOUS SUBSTANCE.

NOTE: THRESHOLDS MAY VARY ACCORDING TO LOCAL AND STATE REGULATIONS.

TOXIC CHEMICAL RELEASE REPORTING (40 CFR PART 372):

THIS PRODUCT CONTAINS THE FOLLOWING COMPONENT(S) (AT A LEVEL OF 1% OR
GREATER IF HAZARDOUS; 0.1% OR GREATER IF CARCINOGENIC) THAT MAY BE
SUBJECT TO REPORTING ON THE TOXIC RELEASE INVENTORY (TRI) FORM R: NONE.

STATE AND COMMUNITY RIGHT-TO-KNOW REGULATIONS:

THIS MATERIAL MAY BE REGULATED BY LOUISIANA'S RIGHT-TO-KNOW LAW
(REGULATORY STATUTE 30:2361).

PRODUCT NAME: MAPLLC NO. 2 FUEL OIL DYED (0.5% SULFUR MAX)
MSDS NO: 0118MAR019

16. OTHER INFORMATION

NFPA CLASSIFICATION

HEALTH: 1
FIRE: 2
REACTIVITY: 1
OTHER: -

HMS CLASSIFICATION

HEALTH: 1
FIRE: 2
REACTIVITY: 1
PERSONAL PROTECTION: *

HAZARD RATING

0 - LEAST
1 - SLIGHT
2 - MODERATE
3 - HIGH
4 - EXTREME

COMMENTS:

* SEE SECTION 8 FOR GUIDANCE IN SELECTION OF PERSONAL PROTECTIVE EQUIPMENT.

*** DISCLAIMER ***

THIS INFORMATION RELATES ONLY TO THE SPECIFIC MATERIAL DESIGNATED AND MAY NOT BE VALID FOR SUCH MATERIAL USED IN COMBINATION WITH ANY OTHER MATERIALS OR IN ANY PROCESS. SUCH INFORMATION IS, TO THE BEST OF MARATHON ASHLAND PETROLEUM LLC'S KNOWLEDGE AND BELIEF, ACCURATE AND RELIABLE AS OF THE DATE INDICATED. HOWEVER, NO REPRESENTATION, WARRANTY OR GUARANTEE IS MADE AS TO ITS ACCURACY, RELIABILITY OR COMPLETENESS. IT IS THE USER'S RESPONSIBILITY TO SATISFY HIMSELF AS TO THE SUITABLENESS AND COMPLETENESS OF SUCH INFORMATION FOR HIS OWN PARTICULAR USE.



Wacker

*Global Fuels Technology
Naperville Complex
150 West Warrenville Road
Naperville, IL 60563-8460*

November 5, 2003
Mr. Tim Wacker
Jackson, MI

Facsimile No. (734) 428-0111

This is to confirm that Low Sulfur #2 Diesel, dyed, supplied out of the BP Jackson, MI terminal complies with the specs for No. 2 Low Sulfur as per D-396-02a. Additionally, it conforms also with ASTM D-975.

If I can be of further assistance, please do not hesitate to contact me.

Sincerely,

William (Val) Zudic
Technical Service Engineer
(630) 420-4516

Wacker

BP
Global Fuels Technology
150 West Warrenville Road
Naperville, Illinois 60563-8460

July 29, 2003

Mr. Tim Wacker
Via fax 734-428-0111

Dear Tim:

This letter reports the sulfur test analysis results on samples of BP's Amoco branded low sulfur Premier Diesel Fuel supplied from the Jackson, MI terminal. For 2003, the sulfur levels in Amoco PDF are as follows:

Sulfur in Amoco PDF

Minimum	171 ppm
Maximum	308
Average	232 +/- 60

If you have any questions, please call BP Global Fuels Technology.

A handwritten signature in cursive script that reads "Jim".

Jim Simnick, PhD
BP Amoco Global Fuels Technology
1-800-841-5255

. cc Mike Winward

Serving Customers
with Amoco Products
Since 1952

**OIL & PROPANE**

Gasoline - Fuel Oil - Premier Diesel Fuel
Lubricants - Propane Supply & Delivery

FAX SHEET COVER

Date: 8-25-03

To: Beth

At: P Fizer

From: W

Total Pages Sent: 4

Comments: _____

*If this is unclear or missing pages please call us at
(734) 428-8366, Thank you.*

G. E. Wacker, Inc.

9080 MI State Road 52, Manchester, MI 48158-9751

(734) 428-8366 - (800) 535-5949 - Fax: (734) 428-0111 - e-mail: WackerOil@aol.c



Wacker Product Information

AMOCO PREMIER DIESEL FUEL, LOW SULFUR

PRODUCT DESCRIPTION

Amoco Premier Diesel Fuel, Low Sulfur is a true premium diesel fuel. That's because Amoco Premier Diesel Fuel is more than a regular No. 2 fuel with additives. Starting in the refinery, we select and blend superior quality basestocks for Amoco Premier. Then we add our exclusive Guardian additive package developed especially for Premier by BP scientists to make it even better. The result is a true premium diesel fuel as defined by the Joint EMA/TMC (Engine Manufacturers Association/The Maintenance Council) Consensus Specification for Premium Diesel Fuel. This means Amoco Premier delivers improved performance and increased engine durability. You can count on Amoco Premier.

APPLICATION

Amoco Premier Diesel Fuel, Low Sulfur is recommended for use in all on-road heavy duty truck, automotive, and bus applications. It is also recommended for all off-road, marine, and stationary diesel engine applications where a lower sulfur content for lower emissions is needed. Whether on the highway, on the farm, or on the construction site, Amoco Premier Diesel Fuel, Low Sulfur is the quality choice for your diesel fuel.

FEATURES

High Cetane Number Rating for Superior Ignition Quality – The cetane number rating of a diesel fuel defines its ignition quality; the higher the cetane rating, the better the quality. Amoco Premier Diesel Fuel, Low Sulfur has a minimum cetane number rating (D-613) of 50, compared to a cetane number rating of 40 – 45 for regular No. 2 diesel fuels. Compared to regular No. 2 diesels, the higher cetane rating of Premier means easier ignition and quicker starting at lower temperatures.

It also means cleaner burning with reduced smoke and odor while providing faster, smoother warm-ups and quieter operation.

Amoco's Exclusive Guardian Additive Package – Amoco's Guardian Additive Package provides the following benefits:

- A detergent and dispersant to help keep injectors and your fuel system clean. Amoco Premier meets the tough Cummins L-10 Injector cleanliness test.
- Enhanced lubricity to provide added protection to your pumps and injectors. Amoco Premier provides the lubricity your diesel engine needs for trouble-free operations.
- A demulsifier to help shed water resulting in a reduced potential for corrosion and performance problems caused by wet fuel.
- Stability enhancers that extend the useful storage life of Amoco Premier by providing resistance to gum and resin formation.
- Added thermal stability to withstand the higher fuel temperatures in modern diesel engines.
- A metal deactivator to suppress the production of gum and varnish caused by brass, copper, and other metals in the fuel system.
- A corrosion inhibitor to protect injectors, fuel systems, and storage tanks from damage due to rust or other corrosion.

Low Sulfur Content – Amoco Premier Diesel Fuel, Low Sulfur easily meets the Federal requirements for fuel sulfur level. Low sulfur is necessary to meet today's heavy duty diesel standards for particulate emissions. Low sulfur content also helps prevent corrosion of engine parts, helping to reduce wear and tear on your engine. Compared to regular No. 2 diesels, injectors remain cleaner and deposits are fewer which means reduced oil contamination and significantly less smoke and fuel odors.

bp



Product Information -- Amoco LS Premier Diesel Fuel

<u>PROPERTY</u>	<u>TEST METHOD</u>	<u>LIMIT</u>
Ash, wt. %, max.	D-482	0.01
Cetane Index, min.	D-976	45.0
Cetane Number, min.	D-613	50.0
Cloud Point, °F, max. ⁽¹⁾	D-2500	
Summer (3/1 – 9/30)		+15
Winter (10/1 – 2/29)		+5
Color, ASTM, max.	D-1500	1.5
Conductivity, cu, min. ⁽²⁾	D-2624	100
Copper Corrosion, 3 hrs @122 °F, max.	D-130	1
Distillation, °F	D-86	
Temp.@ 10%, recovered, max.		465
Temp.@ 50%, recovered, max.		520
Temp.@ 90%, recovered		540-630
Temp.@ Endpoint, max.		690
Flash Point, °F, min.	D-56 or D-93	130
Gravity, °API	D-287	34.0 – 39.0
Pour Point, °F, max. ⁽¹⁾	D-97	
Summer (3/1 – 9/30)		+5
Winter (10/1 – 2/29)		-20
Stability, Aged Sediment, mg/100mL, max.	ACM-15.19	1.5
Sulfur, total, wt. %, max.	D-2622 or D-4294	0.05
Viscosity, cSt @ 40 °C, min. ⁽²⁾	D-445	2.14 - 4.1
Water & Sediment, vol. %, max.	D-2709	0.02

Notes

- (1) Cloud and pour point values may vary with region. Call Quality & Technical Service for details.
 (2) Conductivity and viscosity may vary with season. Call Quality & Technical Service for details.

For information on Amoco fuels, contact:
 Quality & Technical Service
 1-800-841-5255
 600 Mapleview Complex
 600 West Warrenville Road
 Warrenville, Illinois 60563
 Website: www.BP.com
 12/01

MATERIAL SAFETY DATA SHEET



PREMIUM NO. 2 DIESEL FUELS

Covers all Amoco Premier, Super and PowerBlend diesel fuel brands.

MSDS No. 12640000 ANSI/ENGLISH

1.0 CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: PREMIUM NO. 2 DIESEL FUELS

MANUFACTURER/SUPPLIER:

Amoco Oil Company
200 East Randolph Drive
Chicago, Illinois 60601 U.S.A.

EMERGENCY HEALTH INFORMATION:

1 (800) 447-8735

EMERGENCY SPILL INFORMATION:

1 (800) 424-9300 CHEMTREC (USA)

**OTHER PRODUCT SAFETY
INFORMATION:**

(630) 836-5441

2.0 COMPOSITION/INFORMATION ON INGREDIENTS

Component	CAS#	Range % by Wt.
Petroleum distillate	68476-30-2	95-100
Trimethylbenzene	95-63-6	0-1.1
Xylene	1330-20-7	0-1
Nonane	111-84-2	0-1.1

(See Section 8.0, "Exposure Controls/Personal Protection", for exposure guidelines)

3.0 HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW: Warning! Combustible. Harmful or fatal if liquid is aspirated into lungs. Causes skin irritation on prolonged or repeated contact.

Serving Customers
With Amoco Products
Since 1912**OIL & PROPANE**Gasoline - Fuel Oil - Premier Diesel Fuel
Lubricants - Propane Supply & Delivery

FAX SHEET COVER

Date: 8-20-03To: BethAt: RazerFrom: RebeccaTotal Pages Sent: 12Comments: MSDS - Diesel Fuelcopies of delivery invoices

*If this is unclear or missing pages please call us at
(734) 428-8366, Thank you.*

G. E. Wacker, Inc.

9050 MI State Road 52, Manchester, MI 48158-9751

(734) 428-8366 - (800) 535-5949 - Fax: (734) 428-0111 - e-mail: WackerOil@aol.c

POTENTIAL HEALTH EFFECTS:

EYE CONTACT: No significant health hazards identified.

SKIN CONTACT: Causes skin irritation on prolonged or repeated contact. See "Toxicological Information" section (Section 11.0).

INHALATION: No significant health hazards identified for the liquid fuel. See "Toxicological Information" section (Section 11.0).

INGESTION: Harmful or fatal if liquid is aspirated into lungs. Ingestion causes gastrointestinal irritation and diarrhea. See "Toxicological Information" section (Section 11.0).

HMIS CODE: (Health:0) (Flammability:2) (Reactivity:0)

NFPA CODE: (Health:0) (Flammability:2) (Instability:0)

4.0 FIRST AID MEASURES

EYE: Flush eyes with plenty of water.

SKIN: Wash exposed skin with soap and water. Remove contaminated clothing, including shoes, and thoroughly clean and dry before reuse.

INHALATION: If adverse effects occur, remove to uncontaminated area. Get medical attention.

INGESTION: If swallowed, do NOT induce vomiting. Get immediate medical attention.

5.0 FIRE FIGHTING MEASURES

FLASHPOINT: 120-180°F (Tag closed cup)

UEL: 7.5%

LEL: 0.6%

AUTOIGNITION TEMPERATURE: Not determined.

FLAMMABILITY CLASSIFICATION: Combustible Liquid.

EXTINGUISHING MEDIA: Agents approved for Class B hazards (e.g., dry chemical, carbon dioxide, foam, steam) or water fog. Water may be ineffective but should be used to cool-fire exposed containers, structures and to protect personnel.

UNUSUAL FIRE AND EXPLOSION HAZARDS: Combustible liquid.

FIRE-FIGHTING EQUIPMENT: Firefighters should wear full bunker gear, including a positive pressure self-contained breathing apparatus.

PRECAUTIONS: Keep away from sources of ignition (e.g., heat and open flames). Use with adequate ventilation.

HAZARDOUS COMBUSTION PRODUCTS: Combustion of this product in an area without adequate ventilation may result in hazardous levels of combustion products (e.g., carbon monoxide, carbon dioxide) and inadequate oxygen levels.

6.0 ACCIDENTAL RELEASE MEASURES

Remove or shut off all sources of ignition. Prevent spreading by diking, ditching, or absorbing on inert materials. Keep out of sewers and waterways.

7.0 HANDLING AND STORAGE

HANDLING: Use with adequate ventilation. Keep away from ignition sources (e.g., heat, sparks, or open flames). Ground and bond containers when transferring materials. Wash thoroughly after handling.

STORAGE: Store in combustible liquids storage area. Store away from heat, ignition sources, and open flame in accordance with applicable regulations.

8.0 EXPOSURE CONTROLS / PERSONAL PROTECTION

EYE: None required; however, use of eye protection is good industrial practice.

SKIN: Avoid prolonged or repeated skin contact. Wear protective clothing and gloves if prolonged or repeated contact is likely.

INHALATION: Use with adequate ventilation. If ventilation is inadequate, use NIOSH certified respirator that will protect against organic vapor and dust/mist.

ENGINEERING CONTROLS: Control airborne concentrations below the exposure guidelines.

EXPOSURE GUIDELINES:

Component	CAS#	Exposure Limits
Petroleum distillate	68476-30-2	No exposure limit established
Trimethylbenzene	95-63-6	OSHA PEL: 25 ppm (1989); Not established. (1971) ACGIH TLV-TWA: 25 ppm Mexico TWA: 25 ppm Mexico STEL: 35 ppm
Xylene	1330-20-7	OSHA PEL: 100 ppm (1989)(1971) OSHA STEL: 150 ppm (1989); Not established. (1971) ACGIH TLV-TWA: 100 ppm ACGIH TLV-STEL: 150 ppm Mexico TWA: 100 ppm (skin) Mexico STEL: 150 ppm (skin)
Nonane	111-84-2	OSHA PEL: 200 ppm (1989); Not established. (1971) ACGIH TLV-TWA: 200 ppm Mexico TWA: 200 ppm Mexico STEL: 250 ppm

9.0 CHEMICAL AND PHYSICAL PROPERTIES

APPEARANCE AND ODOR: Liquid. Clear or red. Petroleum odor.

pH: Not determined.

VAPOR PRESSURE: Not determined.

VAPOR DENSITY: Not determined.

BOILING POINT: 340-675°F (approximate range)

MELTING POINT: Not determined.

SOLUBILITY IN WATER: Negligible, below 0.1%.

SPECIFIC GRAVITY (WATER=1): 0.85 to 0.88

VISCOSITY: 1.8-3.6cSt at 100°F

10.0 STABILITY AND REACTIVITY

STABILITY: Stable.

CONDITIONS TO AVOID: Keep away from ignition sources (e.g. heat, sparks, and open flames).

MATERIALS TO AVOID: Avoid chlorine, fluorine, and other strong oxidizers.

HAZARDOUS DECOMPOSITION: None identified.

HAZARDOUS POLYMERIZATION: Will not occur.

11.0 TOXICOLOGICAL INFORMATION

ACUTE TOXICITY DATA:

EYE IRRITATION: Testing not conducted. See Other Toxicity Data.

SKIN IRRITATION: Testing not conducted. See Other Toxicity Data.

DERMAL LD50: Testing not conducted. See Other Toxicity Data.

ORAL LD50: Testing not conducted. See Other Toxicity Data.

INHALATION LC50: Testing not conducted. See Other Toxicity Data.

OTHER TOXICITY DATA: Similar products have produced maximum eye irritation scores ranging from 0.33 to 1.0/110.0; 24 hours (rabbits). Similar products have produced primary skin irritation scores ranging from 0.67 to 3.83/8.0 (rabbits). Dermal LD50 for similar products was greater than 2g/kg; practically nontoxic for acute exposures by this route. For a similar product oral LD50 was greater than 5g/kg; practically non-toxic for acute exposures by this route.

Middle distillate: From skin-painting studies of petroleum distillates of similar composition and distillate range, it has been shown that these types of materials often possess weak carcinogenic activity in laboratory animals. In these tests, the material is painted on the shaved backs of mice twice a week for their lifetime. The material is not washed off between applications. Therefore, there may be a potential risk of skin cancer from prolonged or repeated skin contact with this product in the absence of good personal hygiene. This particular product has not been tested for carcinogenic activity, but we have chosen to be cautious in light of the findings with other distillate streams.

Occasional skin contact with this product is not expected to have serious effects, but good personal hygiene should be practiced and repeated skin contact avoided. This product can also be expected to produce skin irritation upon prolonged or repeated skin contact. Personal hygiene measures taken to prevent skin irritation are expected to be adequate to prevent risk of skin cancer.

Materials of this type have been shown to produce kidney damage in male rats following prolonged inhalation exposures. Following extensive research, this effect appears to be unique to the male rat and is considered to be of little or no relevance in terms of human health risk.

This product has a sufficiently low vapor pressure to prevent a hazardous buildup of vapors unless the product is heated, used in a confined space with inadequate ventilation or misted. Inhalation of mist or high concentrations of vapors can produce dizziness, headache, nausea, unconsciousness and death, and possibly cause irritation of the eye, nose and throat.

Ingestion of this material can cause gastrointestinal irritation and diarrhea. Aspiration of this product into the lungs can cause chemical pneumonia and can be fatal. Aspiration into the lungs can occur while vomiting after ingestion of this product. Do not siphon by mouth.

NIOSH has recommended that whole diesel exhaust be regarded as a potential occupational carcinogen, based on findings of carcinogenic responses in laboratory animals exposed to whole diesel exhaust. The excess cancer risk for workers exposed to diesel exhaust has not been calculated; however, exposure should be minimized to reduce potential risk.

No component of this product present at levels greater than 0.1% is identified as a carcinogen by the U.S. National Toxicology Program, the U.S. Occupational Safety and Health Act, or the International Agency on Research on Cancer (IARC).

12.0 ECOLOGICAL INFORMATION

Ecological testing has not been conducted on this material by BP Amoco.

13.0 DISPOSAL INFORMATION

Disposal must be in accordance with applicable federal, state, or local regulations. Enclosed-controlled incineration is recommended unless directed otherwise by applicable ordinances.

The container for this product can present explosion or fire hazards, even when emptied! To avoid risk of injury, do not cut, puncture, or weld on or near this container. Since the emptied containers retain product residue, follow label warnings even after container is emptied.

14.0 TRANSPORTATION INFORMATION

U.S. DEPT OF TRANSPORTATION

Shipping Name	Diesel Fuel
Hazard Class	Combustible liquid.
Identification Number	NA1993
Packing Group	III

INTERNATIONAL INFORMATION:**Sea (IMO/IMDG)****Shipping Name** Diesel Fuel**Class** 3.3**Packing Group** III**UN Number** UN1202**Air (ICAO/IATA)****Shipping Name** Diesel Fuel , UN1202**Class** 3**Packing Group** III**European Road/Rail (ADR/RID)****Shipping Name** Not determined.**Canadian Transportation of Dangerous Goods****Shipping Name** Fuel Oil**Hazard Class** 3**UN Number** UN1202**Packing Group** III

15.0 REGULATORY INFORMATION

CERCLA SECTIONS 102a/103 HAZARDOUS SUBSTANCES (40 CFR Part 302.4): This product is exempt from the CERCLA reporting requirements under 40 CFR Part 302.4. However, if spilled into waters of the United States, it may be reportable under 33 CFR Part 153 if it produces a sheen.

SARA TITLE III SECTION 302 EXTREMELY HAZARDOUS SUBSTANCES (40 CFR Part 355): This product is not regulated under Section 302 of SARA and 40 CFR Part 355.

SARA TITLE III SECTIONS 311/312 HAZARDOUS CATEGORIZATION (40 CFR Part 370): This product is defined as hazardous by OSHA under 29 CFR Part 1910.1200(d). Hazardous categories for this product are: Acute = yes; Chronic = yes; Fire = yes; Pressure = no; Reactive = no.

SARA TITLE III SECTION 313 (40 CFR Part 372): This product contains the following substance(s), which is on the Toxic Chemicals List in 40 CFR Part 372:

Component/CAS Number	Weight Percent
Trimethylbenzene 95-63-6	1.1
Xylene 1330-20-7	1

U.S. INVENTORY (TSCA): Listed on inventory.

OSHA HAZARD COMMUNICATION STANDARD: Combustible liquid. Irritant.

WHMIS Controlled Product Classification: B3, D2A, D2B.

EC INVENTORY (EINECS/ELINCS): One or more components not listed on inventory.

JAPAN INVENTORY (MITI): One or more components not listed on inventory.

AUSTRALIA INVENTORY (AICS): One or more components not listed on the inventory.

KOREA INVENTORY (ECL): One of more components not listed on inventory.

CANADA INVENTORY (DSL): One or more of the components of this product is not listed on the DSL.

PHILIPPINE INVENTORY (PICCS): One or more components not listed on the inventory.

16.0 OTHER INFORMATION

Prepared by:

Environment, Health and Safety Department

Issued: August 04, 1999

This Material Safety Data Sheet conforms to the requirements of ANSI Z400.1.

NOTICE: The information presented herein is based on data considered to be accurate as of the date of preparation of this Material Safety Data Sheet. However, no warranty or representation, express or implied, is made as to the accuracy or completeness of the foregoing data and safety information, nor is any authorization given or implied to practice any patented invention without a license. In addition, no responsibility can be assumed by vendor for any damage or injury resulting from abnormal use, from any failure to adhere to recommended practices, or from any hazards inherent in the nature of the product.

8050 MI STATE ROAD 52
MANCHESTER, MI 48158
PHONE: (734) 425-8355
MI TOLL FREE (800) 535-5849
ID # 38-2073767



CASH SALE	CREDIT SALE

PAY TO ORDER OF		DATE	
P5, 2AR		8-16-53	
2000 Plymouth Rel		SAVINGS No. 432388	
		CUSTOMER ACCT. NO.	
PO# 148A340626		PURCH. ORD. NO.	
DAY		UN-1200	
NA-1000		UN-1223	
PRODUCT	HEATER OIL	DIESEL FUEL	FURNACE OIL
CODE	1	2	3
PRODUCT	CODE	GALES	PRICE
Use As Home Heating			
On Highway Use	8.2094	1.18	9
Highway Use			
Use by Government			
MICHIGAN ROAD TAX NOT INCLUDED		MICHIGAN ROAD TAX INCLUDED	
PRODUCT	QTY.	PRICE	
PO# 148A 340626			
Dyed Diesel, Fuel, Non-taxable use only, Penalty For Taxable Use.			
SUB TOTAL		2451.80	
STATE SALES TAX 6 % of 6		149.39	
TOTAL DUE		2601.19	
MOTOR FUEL TAX		Gallons	
Rate		Amount	
2639.27			

Buyer acknowledges receipt of goods and agrees to the Terms set forth below for all purchases made within one year of this date. TERMS: PAYMENT DUE 15 DAYS FROM DATE OF THIS INVOICE. A late payment FINANCE CHARGE composed of periodic rates shown below may be assessed against all amounts unpaid 30 days or more from the date of the last statement and this periodic charge for late payment shall apply to all charges on monthly statements furnished me for the balance of the current calendar year. In the event a FINANCE CHARGE is assessed, it will be 2.000 % per month or an ANNUAL RATE OF 24 % per year.

John Shaw

Copy
included
w/ invoices

gallons = 2094.1

Certificate of Analysis



SINCE 1985

Quality Controlled Through Analysis

10630 FALLSTONE RD HOUSTON, TEXAS 77099
P.O. BOX 741905, HOUSTON, TEXAS 77274

TEL: (281) 495-2400
FAX: (281) 495-2410

CLIENT:	Pfizer Global Research & Development	REQUESTED BY:	Ms Kim Alfonsi
SAMPLE:		REPORT DATE:	August 25, 2003
LABORATORY NO:	30407	PURCHASE ORDER NO:	Pending

TEST

RESULTS

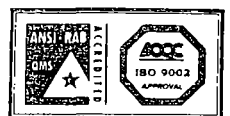
<u>Lab No.</u>	<u>Sample ID</u>	<u>Sulfur Content by X-Ray Method,</u> <u>ASTM D 4294, wt %</u>
30407-01	50K Tank Fuel Oil Sample 1	0.042
30407-02	50K Tank Fuel Oil Sample 2	0.042

Respectfully submitted
FOR TEXAS OILTECH LABORATORIES

A. Phil Sorurbakhsh
Associate Laboratory Director



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Cert No 5085



10630 FALLSTONE DRIVE, HOUSTON, TEXAS 77099
P. O. BOX 741905 HOUSTON, TEXAS 77274

TEL: (281) 495-2400

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FAX

To:	Ms. Kim Alfonsi
Company:	Pfizer Global Research & Development
Phone:	734-622-2295
Fax:	734-622-4912

From:	Ms. Lilibeth Daza
Company:	Texas OilTech Laboratories, Inc.
Date:	August 25, 2003
Pages including this cover page:	2

☒ **Urgent** ☒ **For Review** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

8/28/03 - Data
was properly
QC'd and
all results
were 100%
satisfactory

ROP Conditions & Compliance Demonstration
2800 Plymouth Road/1600 Huron Parkway

Period Reviewed January -December 2003
* Permit Effective November 21 2002

Emission Unit	Condition #	Condition	Required Records	Calculations	Deadlines	Computer Tracking Needs	Training Needs	SOPs or General Practices	Compliance Methods	Continuous Compliance	Intermittent Compliance	Deviation	Improvements/ Corrective Actions
EUCOMBUSTOR	Table E-1 I II A	10 percent or less of the weight of the feed stream to the pathological combustor is comprised of hospital/medical/infectious waste in aggregate as averaged and recorded on a calendar quarter basis (40 CFR 60 32e(c)). For purposes of this definition, pathological waste is considered other waste when calculating the percentage of hospital/medical/infectious waste combusted as defined in 40 CFR 60 51c	Weights of other and HMI wastes (Animal Services) Hours of operation kept on log at combustor (Powerhouse)	None	Calendar Quarter	In place (Env File)	Attended Cagewash Personnel meetings to discuss SOP in 3/03 training on AC & P&U new SOPs issued April 03	Combustor SOPs - Animal Care, SOP #321 0205 01	Quarterly records for Q1-Q4, 2003 in Envir files. Maintenance of circular charts for 5 years by PH. Temperature charts maintained by PH for at least 5 years (which can be used as back up to determine operating hours) Unit permanently dismantled beginning 8/25/03				
EUCOMBUSTOR	Table E-1 I II B	Particulate Matter Emission rate 0.2 lbs PM/1000 pounds exhaust gas corrected to 50% excess air which is equivalent to a maximum of 2.12 tons per year based upon a 12-month rolling period, calculated after the end of each calendar month (R331)	Hours of operation kept on log at combustor (Powerhouse)	None	End of Each Month	In place (Env File)	None	SOP #821 0205 01	Records complete for Q1-Q4 2003. Max 12-month emission calculated was 0.46 TPY for Q1-Q3. Condition limit met. Unit permanently dismantled beginning 8/25/03.				
EUCOMBUSTOR	Appendix 3	Particulate Emissions Stack Test	Particulate stack test is required to be conducted within 12 months of permit issuance using ACD approved methods.	None	Conduct stack test within 12 months of issuance of permit	NA	NA	NA	Stack testing protocol submitted to MDEQ on June 2, 2003. However, permit condition obsolete since unit permanently dismantled beginning 8/25/03. Letter regarding shutdown submitted to MDEQ on 8/13/03.				
EUCOMBUSTOR	Table E-1 I V	Proper O&M of combustor in accordance with approvable PMP (R910)	O&M Records in CMMS (Powerhouse)	None	NA	In place (CMMS)	NA	Task - PU020005 set up for at least annually in PMP	Maintenance of task records, Frequency per the PMP. (SOP #821 0805 21 submitted to MDEQ)	Two PM inspections (1/03, 6/03) completed in 2003. The minimum PMP frequency (annual) for PU020005 was met. See PMP task audit spreadsheet. ABB controller calibrated Q1 2003. See Unscheduled Maintenance & Operational Adjustments Log for incidents which did not result in emission limit deviations. Unit permanently dismantled beginning 8/25/03.	See Deviations Summary for EUCOMBUSTOR for 2003		Provided additional training to AC and P&U personnel/supervisors. Issued enhanced SOPs in April 2003.
EUCOMBUSTOR	Appendix 3	Record periods of time when pathological waste only is burned (40 CFR 60 32e(b))	Hours of combustor operation (Powerhouse) Weights of other & HMI wastes (Animal Services)	NA	Calendar Quarter	In place (Env File)	NA	Combustor SOP (Animal Care) SOP #821 0205 01	Records of operating hours by operator logs or circular charts. Temperature charts used as back up system with primary system being operator log.	Temperature charts (back up for operator's log) are maintained by the PH for at least 5 years. Quarterly records with operators logs for Q1-Q4 2003 in Envir. Files maintained for 5 years. Unit permanently dismantled beginning 8/25/03.			
EU550EMERGEN	Table E-1 2 II B	NOx emissions shall not exceed 15.0 TPY as determined on 12-month rolling time period, calculated after the end of each calendar month (R201, 205(1)(a) and (3))	Operating Hours per CMMS task (Powerhouse) (env calculate emissions)	None	End of Each Month	In place (Env Files)	NA	Task - PU000118 (16220L110008) 12 months	Monthly calculation for NOx complete for Q1-Q4, 2003. PU000118 task completed as required. Max emission calculated monthly for 2003 was 2.72 TPY. Condition limit met.				
EU550EMERGEN	Table E-1 2 V	Shall not operate more than 500 hours per 12-month rolling time period as determined after the end of each calendar month (R201, 205(1)(a) and (3))	Operating Hours per CMMS task (Powerhouse)	NA	End of Each Month	In place (Env File)	NA	Task - PU000118 (16220L110008) 12 months	Records of operating hours by PH readings.	CMMS task requiring log of operating hours was completed/closed for all months in Q1-Q4 2003. Calculation of operating hours complete for 2003 with maximum of 92 hours in 12-months. Condition limit met.			
EU550EMERGEN	Table E-1 2 III A	Daily (non-certified) visual observation for opacity to verify proper firing when the emergency generator is operating for 24 consecutive hours or more (R213(3))	Records of hours of operation	NA	NA	NA	Powerhouse	SOP #821 0805 21	Use SOP #821 0805 21 to alert of any potential deviations.	Daily non-certified visual observations were conducted and documented in the envir files per the SOP during the generator test on August 9 & 10 2003 and the power outage on August 14 & 15 2003. The generator did not operate 24 or more consecutive hours in Q1 Q2, or Q4 2003.			SOP issued in May 2003. Extra training on SOP in 11/03.
EUTURBINE EUDUCTBURNER, FGBUILDERS 1A& 1B FGBUILDERS 5 & 6	Table E-1 3 I B, Table E-1 4 I B, Table F-1 2 I B Table F-1 3 I B	Exhaust gases shall be discharged unobstructed vertically upwards from the roof unless otherwise noted with minimum 87 foot stacks (R201(3))	NA	NA	NA	NA	NA	NA	Stacks for Claytons and Cogen were upgraded in 2000 to meet 87 ft requirement. Stacks for boilers #5 & #6 are new and were installed to meet 87 ft requirement.				
EUTURBINE	Table E-1 3 II A	Sulfur in No. 2 fuel oil shall not exceed 0.10% by weight based on a 30-day rolling time period (40 CFR 60 333 & 334(b) & R201)	Suppliers Certification (Powerhouse)	NA	Each shipment	NA	NA	SOP - #821-0801 01	Suppliers certification	Certifications collected as required. No shipments in Q1-Q4 2003.			Extra training on SOP in 11/03.
EUTURBINE	40 CFR 60 334(b)	Sulfur content in natural gas shall be monitored as requested by MDEQ (custom schedule) per 60 334 (b) (2)		NA	As requested	In place	NA		Results from Supplier collected in 1/03 6/03 & 9/03. Dräger tube test completed 3/03 6/03 10/03 & 12/03. This should provide ample backup data should MDEQ request this data. No request by MDEQ to monitor in Q1-Q4.				

ROP Conditions & Compliance Demonstration
2800 Plymouth Road/1600 Huron Parkway

Period Reviewed January -December 2003
* Permit Effective November 21, 2002

Emission Unit	Condition #	Condition	Required Records	Calculations	Deadlines	Computer Tracking Needs	Training Needs	SOPs or General Practices	Compliance Methods	Continuous Compliance	Intermittent Compliance	Deviation	Improvements/ Corrective Actions
EUTURBINE	Table E-1 3 II B	NO2 emisison rate shall not exceed 167 ppmv on a dry gas basis corrected to 15% O2 at ISO conditions which is equivalent to 36 1 lbs/hr as determined on a 12-month rolling time period calculated after the end of each calendar month (40 CFR 60 332(a)(2), R201, and R401)	Operating Hours & Daily Fuel Usage (Powerhouse)	NA	End of Each Month	In place (Env File)	NA	Daily Tracking Sheets, PTL 500	12/02/03	2003 data table and lbs/hr calculation completed Max monthly calculation was 15 67 lbs/hr Condition limit met			
EUTURBINE	Appendix 3	Test or obtain certification of nitrogen content of fuel oil in turbine (40 CFR 60 334(b))	Oil is sent out for testing when delivered for gas turbine use only	NA	Each shipment	NA	NA	SOP - #821-0801 01	Testing of each batch of fuel oil for N content	N content fuel oil testing results maintained in Environmental files as required Lab testing data received in 1/03 for two shipments to 25K tank in 12/02			Extra training on SOP in 11/03
EUTURBINE, EUDUCTBURNER, FGBOILERS 1A& 1B, FGBOILERS 5 & 6	NOT IN ROP	40 CFR 60 7(a)(4) - Notification of physical or operational changes which may increase emission rates of air pollutants unless specifically exempted	Notification letter	NA	NA	NA	Engineering & Powerhouse personnel to notify Env. of any changes	NA	Should not be an issue because changes to increase emission rates would trigger review for permit implications too	Not applicable at this time No changes during compliance period			
EUTURBINE, EUDUCTBURNER, FGBOILERS 1A& 1B, FGBOILERS 5 & 6	Appendix 3	40 CFR 60 7(b) - Maintain records of occurrence and duration of SSM	Startup, shutdown, and malfunction events relating to abnormal emissions occurrence and duration Daily logs track startup & shutdown malfunctions should be entered into Engineers Log and Adverse Event report will follow up	NA	NA	NA	NA	Daily Tracking Sheets, SOP #821-0801 03	Daily Tracking Sheets SOP Recording of equipment malfunctions through the Engineers log	Daily tracking sheets maintained by PH No malfunction events with impact to air emissions occurred during Q1-Q4 2003			SOP 821 0801 03 revised to enhance reporting (issued April 2003) Extra training on SOP in 11/03
EUTURBINE, EUDUCTBURNER, FGBOILERS 1A& 1B, FGBOILERS 5 & 6	Appendix 3	40 CFR 60 7(f) - Maintain records of measurements, including CEMS, monitoring devices and performance test for at least 2 years following the date of such record	Performance Tests	NA	NA	NA	NA	NA	May 2001 performance test for boiler 5 and boiler 6, and performance test for boiler 1A and 1B NA due to site conditions Performance test for EUDUCTBURNER 1A due to natural gas being used.	Performance testing completed June 2001 for Boilers 5 & 6, and in environmental files Performance test results for turbine (1989) also within environmental files No additional testing required for Q1-Q4 2003			
EUTURBINE, EUDUCTBURNER, FGBOILERS 1A& 1B FGBOILERS 5 & 6	Appendix 3	40 CFR 60 7(g) - Substantially similar notifications to local agencies may be sent to Administrator and satisfy 40 CFR 60 7(a)	NSPS notifications to MDEQ	NA	NA	NA	NA	NA	For all notifications to MDEQ only by telephone	All required NSPS notifications have been sent to MDEQ and are kept on file NSPS notifications sent for notice of construction notice to install and performance testing for boilers 5 & 6 No additional notifications required in Q1-Q4 2003			
EUTURBINE, EUDUCTBURNER, FGBOILERS 1A& 1B, FGBOILERS 5 & 6	NOT IN ROP	40 CFR 60 8 - Performance Tests	Performance Test	NA	NA	NA	NA	NA	Performance test completed June 2001 for Boilers 5 & 6 and in environmental files Performance test results for turbine (1989) also within environmental files No additional testing required for Q1-Q4 2003	Performance testing completed June 2001 for Boilers 5 & 6 and in environmental files Performance test results for turbine (1989) also within environmental files No additional testing required for Q1-Q4 2003			
EUDUCTBURNER, FGBOILERS 1A& 1B FGBOILERS 5 & 6	Appendix 3	40 CFR 60 48c(g) and (l) - Record and maintain for 2 years records of amounts of fuel combusted during each day (5 years required in ROP)	Daily fuel records are kept in powerhouse for minimum of 5 years	NA	NA	NA	NA	NA	Daily Tracking Sheets Powerhouse to maintain for 5 years	Daily tracking sheets maintained by PH for minimum of 5 years			
FGBOILERS5&6	GC2	20 percent opacity (6-min average), except one 6-minute period per hour of not more than 27 percent opacity (40 CFR 60 43c(c) & (d)) Opacity standards apply at all times except during periods of SSM for NSPS compliance	NA	NA	NA	NA	NA	SOP #821-0801 03	Use SOP #821 0801 03 to alert of any potential deviations	Not applicable - there have not been any deviations in 2003			Extra training on SOP in 11/03
EUDUCTBURNER	Table E-1 4 II B	NO2 emission rate shall not exceed 0 14 lbs/mmBTU based on a 30-day rolling time period which is equivalent to a maximum of 1 63 tons per month calculated after the end of each calendar month (R201(3))	Operating Hours & Daily Fuel Usage (Powerhouse)	NA	End of Each Month	In place (Env File)	NA	Daily Tracking Sheets, PTL 500	12/02/03	Data and calculations completed and kept in environmental files for Q1-Q4 2003 Max monthly emission was 1 16 TPM Condition limit met			

ROP Conditions & Compliance Demonstration
2800 Plymouth Road/1600 Huron Parkway

Period Reviewed January -December 2003
* Permit Effective November 21, 2002

Emission Unit	Condition #	Condition	Required Records	Calculations	Deadlines	Computer Tracking Needs	Training Needs	SOPs or General Practices	Compliance Methods	Continuous Compliance	Intermittent Compliance	Deviation	Improvements/ Corrective Actions
EUDUCTBURNER, EUTURBINE FGBOILERS 1A& 1B, FGBOILERS 5 & 6 EUCOMBUSTOR	Appendix 3	Will develop and maintain an approvable PM plan	PM Plan & Associated Inspections	NA	By permit issuance	CMMS (in place)	NA	PU080024 (15510L110003) PU080025 (15510L110002) PU080003 (15510L110001) PU080079 (15510L110008) PU080135-140 (16220L410007-16220L410012), PU080105 (NA - combined w/ 1622410007to12) PU080092 (15510L110009) PU080216 (15510110004) PU080217 (15510L110004)	CMMS Task Records, Frequency per the PMP (PMP was previously submitted to MDEQ)	All maintenance performed at required minimum frequencies. See PMP task audit Q1-Q4 2003 spreadsheet for details. PMP last updated and submitted to MDEQ in Sept. 2003 to remove EUCOMBUSTOR following shutdown.			
EUCOLDCLEANER	Appendix 3	R707(3)(a) - Cover installed and closed when parts not being handled. Mechanical assisted cover is N/A.	MSDS to show vapor pressure < 0.3 psi	NA	NA	NA	NA	Posting to keep cover closed when not in use.	Powerhouse follows posting instructions. Item checked on bi-monthly environmental inspections.	Cover closed and posting present. Bimonthly environmental inspections show this item complete for Q1, Q2 2003 with inspections in 3/03 and 5/03. Unit removed from service 5/03, therefore no inspection in Q3 or Q4 2003.			Last inspection confirmed unit removal from service 5/03. Conditions obsolete for next reporting period.
EUCOLDCLEANER	Appendix 3	R707(3)(b) - Parts drained for at least 15 seconds or dripping ceases.	NA	NA	NA	NA	NA	Posting to drain parts 15 secs.	Powerhouse follows posting instructions. Item checked on bi-monthly environmental inspections.	Instructions posted and bimonthly environmental inspections show this item complete for Q1, Q2 2003 with inspections in 3/03 and 5/03. Last inspection confirmed removal from service 5/03.			Last inspection confirmed unit removal from service 5/03. Conditions obsolete for next reporting period.
EUCOLDCLEANER	Appendix 3	R707(3)(c) - Waste solvent stored only in closed containers & disposed of in manner such that not more than 20% by weight is allowed to evaporate.	NA	NA	NA	NA	NA	Remove solvent from site and dispose of properly.	Powerhouse follows posting instructions. Item checked on bi-monthly environmental inspections.	Waste properly removed and manifested through Safety Kleen in 3/03 and 5/03. Manifests (IL 10592969 and IL10611949) in file for Q1, Q2 2003. No waste removal in Q3 or Q4 as unit removed from service in 5/03.			Last inspection confirmed unit removal from service 5/03. Conditions obsolete for next reporting period.
EUCOLDCLEANER	Appendix 3	R707(4) - Must develop written procedures for operation and posted in accessible, conspicuous location near cold cleaner.	NA	NA	NA	NA	NA	NA	Powerhouse follows posting instructions. Item checked on bi-monthly environmental inspections.	Instructions posted and bimonthly environmental inspections show this item complete for Q1 2003 with last inspection in 3/03. Unit removed from service 5/03.			Last inspection confirmed unit removal from service 5/03. Conditions obsolete for next reporting period.
FGBOILERS2&3	Table F-1 1 I B	Exhaust gases shall be discharged unobstructed vertically upwards from the roof unless otherwise noted with minimum 80 foot stacks. (R201(3))	NA	NA	NA	NA	NA	NA	NA	Survey data shows stack height of 80 ft (888.5 ft to 968.5 ft) in environmental files.			
FGBOILERS2&3	Table F-1 1 I A	Sulfur in No. 2 fuel oil shall not exceed 0.10% by weight, based on a 30-day rolling time period. (R201)	Bulk Fuel Oil Delivery SOP states to check supplier paperwork before accepting delivery. Our agreement with supplier is to get .05% sulfur by weight as opposed to .10% (Powerhouse).	NA	Each shipment	NA	NA	SOP - #821-0801.01	Suppliers certification.	Certifications were collected for multiple shipments (Aug 14-17 '03 during power outage) from 3 suppliers. Fuel oil was used to power generators with some overflow to 50K AST. 2 of 3 suppliers provided low sulfur fuel oil (<0.05%) with the third at <0.5% sulfur. Sample was collected and analysed from 50K AST and showed sulfur content <0.05%. No shipments in Q1, Q2, or Q4 2003.			Extra training on SOP 11/03.
FGBOILERS2&3	Table F-1 1 I B	NO2 emission rate shall not exceed 0.14 lbs/mmBTU based upon a 30-day rolling time period which is equivalent to a maximum of 3.23 tons per month for each unit, calculated after the end of each calendar month. (R201)	Operating Hours & Daily Fuel Usage (Powerhouse).		End of Each Month	In place (Env File)	NA	Daily Tracking Sheets		Monthly calculation for NOx complete Q1-Q4 2003. Max. monthly emission was 0.46 TPM and 0.45 TPM for boilers 2 and 3, respectively. Condition limit met. Oil meter for B3 replaced. B2 oil meter to be installed in Q1 2004.			Replaced oil meter on Boiler 3 in Q1 2003.
FGBOILERS1A&1B	Table F-1 2 I B	NO2 emission rate shall not exceed 0.14 lbs/mmBTU based upon a 30-day rolling time period which is equivalent to a maximum of 1.02 tons per month for each unit, calculated at the end of each calendar month. (R201)	Operating Hours & Daily Fuel Usage (Powerhouse).		End of Each Month	In place (Env File)	NA	Daily Tracking Sheets	Note: Powerhouse removed internal tests on fuel oil from MP2 tank and capped off fuel oil lines.	Monthly calculation for NOx complete for Q1-Q4 2003. Max. monthly emission was 0.08 TPM and 0.12 TPM for boilers 1A and 1B, respectively. Condition limit met.			

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Emission Unit	Condition #	Condition	Required Records	Calculations	Deadlines	Computer Tracking Needs	Training Needs	SOPs or General Practices	Compliance Methods	Continuous Compliance	Intermittent Compliance	Deviation	Improvements/ Corrective Actions
FGBOILERS1A&1B	Table F-1 2 II A	Sulfur in No. 2 fuel oil shall not exceed 0.05% by weight, based on a 30-day rolling time period (R401, R201 and 40 CFR 60.42c(d) and (h)(1))	Suppliers Certification (40 CFR 60.42c(h)(1)) (Powerhouse)	NA	Each shipment	NA	NA	SOP - #821-0801.01	Suppliers certification	Certifications were collected for multiple shipments (Aug 14-17 03 during power outage) from 3 suppliers. Fuel oil was used to power generators with some overflow to 50K AST. 2 of 3 suppliers provided low sulfur fuel oil (<0.05%) with the third at <0.5% sulfur. Sample was collected and analysed from 50K AST and showed sulfur content <0.05%. No shipments in Q1, Q2, or Q4 2003.			Extra training on SOP 11/03
FGBOILERS1A & 1B, FGBOILERS5&6	Appendix 3	Monitoring and recording of emissions and operating info to comply with 40 CFR 60 Subpart A and Dc. Any required source emissions and operating data required to be reported under 40 CFR 60.48c submitted semiannually to District Supervisor (40 CFR 60.48c(d), (e) and (f)).	Semi-Annual Report: Suppliers Certification (Powerhouse), Operating Hours & Daily Fuel Use (Powerhouse)	NA	3/15 for July - Dec and 9/15 for Jan - Jun	CMMS	NA	Per EN000171 PT 1540. Suppliers Tracking Sheets	Suppliers certifications submitted to MDEQ daily; fuel use maintained on site.	Supplier's certifications submitted to MDEQ in 3/03 for July to Dec 2002 and in 9/03 for Jan to June 2003. Next report due by 3/15/04 for reporting period July to Dec 2003.			
FGBOILERS5&6	Table F-1 2 II A	Sulfur in No. 2 fuel oil shall not exceed 0.10% by weight, based on a 30-day rolling time period (R401, R201 and 40 CFR 60.42c(d)).	Suppliers Certification (40 CFR 60.42c(h)(1)) (Powerhouse)	NA	Each shipment	NA	NA	SOP - #821-0801.01	Supplier certification	Certifications were collected for multiple shipments (Aug 14-17 03 during power outage) from 3 suppliers. Fuel oil was used to power generators with some overflow to 50K AST. 2 of 3 suppliers provided low sulfur fuel oil (<0.05%) with the third at <0.5% sulfur. Sample was collected and analysed from 50K AST and showed sulfur content <0.05%. No shipments in Q1, Q2, or Q4 2003.			
FGBOILERS5&6	Table F-1 3 II B	NO2 emission rate shall not exceed 0.14 lbs/mmBTU based upon a 30-day rolling time period which is equivalent to a maximum of 3.58 tons per month for each unit, calculated at the end of each calendar month.	Operating Hours & Daily Fuel Usage (Powerhouse)	NO2 Emissions in Excess of Permit Limits	End of Each Month	Inplace (Envir Files)	NA	Daily Tracking Sheets, FT 1540	Monthly calculation of NO2	Monthly calculation for NOx complete for Q1-Q4 2003. Max monthly emission was 0.82 TPM and 0.83 TPM for boilers 5 and 6, respectively. Condition limit met.			
FGPowerhouse	Table F-1 4 III A	Complete copy of fuel oil certification as supplied by the fuel oil supplier and as defined in 40 CFR 60.48c(f)(1) shall be submitted to the District Supervisor, Air Quality Division by March 15 for the reporting period July 1 to Dec 31 and by 9/15 for the reporting period January 1 to June 30. Records of supplier certifications to represent all of the fuel oil combusted during the semi-annual period.	Semi-Annual Report: Suppliers Certification stored in Powerhouse; Daily Fuel Use (Powerhouse)	NA	3/15 for July - Dec and 9/15 for Jan - Jun	NA	NA	Per EN000171 PT 1540	Suppliers certifications submitted to MDEQ	Semi-annual report including any applicable fuel oil certifications submitted with annual report to MDEQ in 3/03 for July to Dec 2002 and in 9/03 for Jan to June 2003. Next semi-annual report per EN000171 due 3/15/04.			
FGPowerhouse	Table F-1 4 III A	Records of the fuel ratio for each additive shall be kept on file for a period of at least 5 years and made available to MDEQ on request.	Fuel Additive Ratio log is used per SOP for amount of additive and amount of oil (Powerhouse)	NA	NA	NA	NA	SOP - #821-0801.01 #821-0801.03	Fuel Additive ratio records for turbine and 25 & 50K tanks. Maintain for 5 years by powerhouse.	Environmental records contained copies of fuel oil additive ratio calculations whenever used for Q1-Q4 2003. No additive placed in tanks during delivery in 12/02. Additive was placed in tanks in March 2003 when supply replenished with record in the envir file. No additive was used 7/6/03 for turbine. Turbine started on oil and remained in unloaded state. Turbine switched to NG and then loaded. Turbine was repaired to start on NG. See PMP audit for details.			
FGPowerhouse	Table F-1 4 III A	Reading, etc. rounded to the nearest significant digit.	NA	NA	NA	NA	NA	NA	Follow rounding for all calculations.	No action.			
All	GC 2	Opacity limit of 6-min ave of 20% except for one 6 minute ave. per hour of not more than 27% opacity (R301)	NA	NA	NA	NA	NA	SOP - #821-0801.03 821.0205.01 821.0805.21 Combustor SOP - Animal Care	SOP #821.0801.03 for powerhouse equipment	No known events of opacity in exceedence of the permit requirement for Q1-Q4 2003.			SOP 821.0801.03 821.0801.21 821.0205.01 revised and issued in Q2 2003 to enhance reporting.
All	GC 1	Challenges do not set aside applicability of permit conditions (R312(1)(f))	NA	NA	NA	NA	NA	NA	NA	Not applicable.			Extra SOP training in 11/03
All	GC 3	Collected air contaminants removed to maintain equipment in manner to minimize introduction to outer air.	NA	NA	NA	NA	NA	Combustor SOPs - Animal Care	Follow Combustor SOP - Animal Care	Ash is removed daily prior to start up of the combustor per the Animal Care SOP. Combustor dismantled beginning 8/25/03.			

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Emission Unit	Condition #	Condition	Required Records	Calculations	Deadlines	Computer Tracking Needs	Training Needs	SOPs or General Practices	Compliance Methods	Continuous Compliance	Intermittent Compliance	Deviation	Improvements/ Corrective Actions
All	GC 4	Air cleaning devices must be installed, maintained and operated in satisfactory manner and accordance with rules (R910)	NA	NA	NA	NA	NA	NA	Follow Task PU020005 for EUCOMBUSTOR and PU035005 (16220L110006) for B35 feed dust collector (exempt equipment)	PU020005 - Two PM inspections (1/03 & 6/03) completed in Q1-Q2 2003. Combustor dismantled in Q3, therefore no additional completions for Q3. (PMP frequency annual). PU035005 - Monthly inspections of dust collector completed for all months in 2003.			
All	GC 5	Conduct performance tests at request of MDEQ (R1001)	NA	NA	NA	NA	NA	NA	Test as required	Not applicable in Q1-Q4 2003. No requests by MDEQ this period.			
All	GC 6	Changes of ownership or operational control (R216(1) and 219(3))	Notification to MDEQ	NA	NA	NA	NA	NA	File and date change notification	Ownership unchanged, but letter was submitted when Parke-Davis' parent company became Pfizer. Correspondence contained in Environmental files. Not applicable in this period.			
All	GC 7	Nuisance Prohibition (R901)*	NA	NA	NA	NA	NA	Combustor SOPs - Animal Care	Eliminate dust emissions from animal care facility	There have been no off-site complaints for the combustor in 2003. Investigation of deposits on automobiles at U of M Transportation Incident in 9/03 did not indicate cooling towers as likely source.			
All	GC 8	Noncompliance with any permit condition as grounds for enforcement action (R213(1)(a))	NA	NA	NA	NA	NA	NA	NA	Not applicable during compliance period. Deviations were reported during Q1-Q2 in 9/03 report, but discussion with MDEQ indicated they are not deemed as noncompliance items. No deviations reported for Q3-Q4 2003.			
All	GC 9	No defense if necessary to halt or reduce activity to comply (R213(1)(b))	NA	NA	NA	NA	NA	NA	NA	No action.			
All	GC10	Permit can be modified or revoked for cause. Changes made at own risk under R215 and 216 (R213(1)(c))	Permit modification or revocation under Rule 216 for notification and compliance	NA	See R215 or R216 for applicability	R215 or R216 Log in Env Files	NA	A/E/H/S Approval	Eliminate dust emissions from animal care facility	Records kept for R215/R216 notices in file. Notice submitted 4/30/03 for removal of cold cleaner per R215(1)(a) operational flexibility. Permit to install (48-03) issued on 4/16/03 - an off-permit change per R215(3) with notification of change submitted. Notice submitted on 8/13/03 for dismantling of the combustor per R215(1)(a) operational flexibility.			
All	GC11	Permittee to furnish requested information or records to MDEQ (R213(1)(e))	NA	NA	NA	NA	NA	NA	Records kept in file	No requests during compliance period.			
All	GC12	Permittee to allow access and inspection (R213(1)(d))	NA	NA	NA	NA	NA	NA	NA	MDEQ completed on-site facility inspection for ROP certification on 6/26/03.			
All	GC13	Pay fees (R213(1)(g))	NA. Pay fees as required	NA	As set by MDEQ invoice	NA	NA	NA	Records kept in file	Fees paid by deadline in Q1 2003. No fees due for payment in Q2, Q3, or Q4 2003.			
All	GC 14	No property rights or privileges conveyed (R213(1)(h))	NA	NA	NA	NA	NA	NA	NA	No action.			
All	GC 15	Renewal of permit is timely if application received not earlier than 18 months or later than 6 months before expiration date (R210(7))	NA	NA	NA	CMMS	NA	ASK ENR for PT, 5.000	Records kept in file	Submit between May 21, 2006 and May 27 2007.			
All	GC 16	For modifications, timely application by deadlines in R216 (R210(9))	Submit modification to MDEQ	NA	See Rule 216	NA	NA	NA	Records kept in file	No Rule 216 modifications in Q1-Q4 2003.			
All	GC 17	For changes to processes or process equipment covered in ROP that do not require a revision under R216, must comply with R215	Notification to MDEQ	NA	NA	NA	NA	NA	Records kept in file	Records kept for R215/R216 notices in file. Notice submitted 4/30/03 for removal of cold cleaner per R215(1)(a) operational flexibility. Permit to install (48-03) issued on 4/16/03 - an off-permit change per R215(3). Notice submitted on 8/13/03 for dismantling of the combustor per R215(1)(a) operational flexibility.			
All	GC 18	Reasons for department reopening and revising the ROP before expiration (R217)	NA	NA	NA	NA	NA	NA	Records kept in file	No action required during compliance period.			Continue to monitor future MACTs
All	GC 19	All required performance tests conducted in accordance with R 1001(2), R1001(3) and Rule 1003	NA	NA	NA	NA	NA	NA	NA	Not applicable during compliance period.			
All	GC 20	Submit required test results to MDEQ within 60 days of the last date of the test (R1001(4))	Any test results	NA	NA	NA	NA	NA	Records kept in file	Not applicable during compliance period.			
All	GC 21	Record requirements for any required periodic or parametric monitoring (R213(3)(b))	NA	NA	NA	NA	NA	NA	Varies depending upon requirements	Records of laboratory analysis of N and S in fuel oil have appropriate details on test methods, date, sampling date, results, etc.			

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Emission Unit	Condition #	Condition	Required Records	Calculations	Deadlines	Computer Tracking Needs	Training Needs	SOPs or General Practices	Compliance Methods	Continuous Compliance	Intermittent Compliance	Deviation	Improvements/ Corrective Actions
All	GC 22	All required monitoring data, support information (originals) and reports must be kept for period of not less than 5 years (R213(1)(e) and R336 1213(3)(b))	Daily fuel use Combustor Operating Hours combustor throughput MDEQ Form 1000 Fuel Supplier certifications analysis and fuel additive data startup shutdown and malfunction records PMP inspections and records for monitoring and maintenance	NA	NA	NA	NA	Combustor SOPs - Animal Care SOP #821 0205 01 Daily Tracking Sheets, Env. Files System	Maintain all the listed records for minimum of 5 years	All required records available onsite			
All	GC 25	Documents required to be submitted as term or conditions of RO permit shall contain certification by RO (R213(3)(c))	Semi-annual certified reports MAERS reports Fuel certificate report R912 reports Deviation reports	NA	See specific report deadline	NA	NA	EN000013 (PT2 540) EN000171 (PT2 540)		Obtained RO signature for first annual certification MAERS report, and semi-annual fuel certifications and submitted by 3/15/03 deadline Obtained RO signature for semi-annual certification and semi-annual fuel certifications and submitted by 9/15/03 deadline EN000013 EN000171, & EN000174 completed as required			
All	GC 26	Provide notification of abnormal conditions, start-ups, shut-downs of malfunctions that result in excess HAP or toxics emissions for more than 1 hour or excess emissions for more than 2 hours following R912	Review R912 for requirements but can provide initial notification to MDEQ and follow up report	NA	See R912 some require notification within 2 days and report within 10 days to MDEQ	NA	NA	SOP - #821-0801 03, 821 0205 01 821 0805 21 Combustor SOP - Animal Care	Follow SOPs to ensure SOPs are done appropriately	Not applicable as none during Q1-Q4 2003			SOP 821 0801 03 821 0205 01 and 821 0801 21 revised to enhance reporting MAP posted
All	GC 27	Report actual emissions for each regulated air pollutant for each unit/process group utilizing MDEQ forms (R212(7))	MAERS Report	Actual Emissions	March 15 or other set by MDEQ	NA	NA	EN000013 (PT2 540) Daily tracking sheets	Follow R912 and R912 to MDEQ with R912	Submitted March 2003 by deadline EN000013 completed for 2003 during Q1			
All	GC 30 to 33	Permit shield applicability	NA	NA	NA	NA	NA	NA	NA	No action required			
ODS Refrigerants	GC34	Compliance with 40 CFR 82, Subpart F for service, maintenance, repair and disposal of appliances	Maintenance of records for leak rate and servicing invoices with amount of refrigerant Review Refrig Manage Plan Section 5.1	Leak rate for refrigerants > 50 lbs	NA		Refrigerant Tracking System	Power House & Maintenance Facilities from March 2003 SOP 921 0001 26	Following SOP by staff performing transactions and record of transactions in permit record book	All transactions and inventory entered into refrigerant tracking system Records for leak rate and servicing and invoices with amount of refrigerant are included			
ODS Refrigerants	GC 35	Servicing of Motor Vehicle Air Conditioners	NA	NA	NA	NA	NA	NA	No servicing of motor vehicles on site	Not applicable since not performed on site			
All	GC 36 - 39	RMP Conditions are NA with exception of general duty provisions under Section 112(r)(1)	NA not applicable as no regulated substances	NA	NA	NA	NA	NA	Follow RMP conditions as they apply to the facility	Not applicable during this compliance period, but information found in Integrated Spill Plan ETO sterilizer hazard assessment completed in April 2003 Result showed the ETO sterilizer posed no significant hazard			
All	GC 24 and Tables IV 1	Prompt certified reporting of deviations including reporting under R912 for emissions above allowable levels and semiannual reports for other deviations (R213(3)(c))	Report deviations to MDEQ and Env. Files	NA	R912 deadlines or March 15 for July - Dec Sept 15 for Jan - June		ROP Compliance Summary Table (Env. Files)	EN000013 (PT2 540)	Follow R912 and R912 to MDEQ with R912	No deviations that required immediate reporting in Q1-Q4 2003 Deviation report for deviations during Q1-Q2 2003 was submitted by 9/15 with semi-annual report			
All	GC 23 and Tables IV 2	Semi-annual certified reporting of deviations and all required monitoring to MDEQ District (R213(3)(c))	Report deviations to MDEQ and Env. Files	NA	March 15 for July - Dec, Sept 15 for Jan - June		ROP Compliance Summary Table (Env. Files)	EN000013 (PT2 540)	Follow R912 and R912 to MDEQ with R912	Reports submitted by 3/15/03 deadline for Nov 21 to Dec 31, 2002 and by 9/15/03 deadline for Jan to June 2003 EN000174 completed Q1 Q3 2003 Next report due 3/15/04 for reporting period July to Dec 2003			
All	GC 28 GC 29 and Tables IV 3	Annual compliance certification by RO pursuant to G28 and 29 (R213(4)(c))	Report deviations to MDEQ and Env. Files	NA	March 15 for prior calendar year		ROP Compliance Summary Table (Env. Files)	EN000013 (PT2 540)	Follow R912 and R912 to MDEQ with R912	First annual report submitted by 3/15/03 deadline for reporting period Nov 21 to Dec 31 2002 EN000174 completed Q1 2003 Next annual report due 3/15/04 for reporting period Jan to Dec 2003			


Blue Text - Power & Utilities Responsibility
Pink Text - Animal Care Responsibility
Red Text - Action to be completed

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ROP Audit Reviewed By


Kim Alfonsi
Senior Manager, Environmental Affairs

Joe Volstromer
Manager Power and Utilities

Michael Lemon
Head, Environmental Health and Safety

Gwen Day
Manager Animal Care

Aifonsi, Kim

From: Day, Gwendolyn
Sent: Monday, February 23, 2004 8 30 AM
To: Alfonsi, Kim
Subject: FW: ROP Compliance Certification 2003

Kim I have read all of the documents attached below And to the best of my knowledge they are accurate Thanks for all your work on this project

-----Original Message-----

From: Alfonsi, Kim
Sent: Saturday, February 21, 2004 6:52 PM
To: Volstromer, Joseph; Lemon, Michael, Day, Gwendolyn
Cc: Herner, Holly
Subject: ROP Compliance Certification 2003

Joe & Gwen,

I have a meeting to go over the Renewable Operating Permit with Dr. Canter on 3/4. We will be certifying compliance with all conditions with the exception of the 3 instances of operation of the pathological waste combustor in Q1/Q2 during abnormally low temperature conditions. We have already reported this in our Q1-Q2 report which Dr. Canter signed but since this report is for all of 2003, it hangs on one last time.

I've attached the table of all permit conditions and our internal audit review. Please review with particular emphasis on your sections (powerhouse in blue and AC in pink). We ask that you sign off that you have reviewed and the information is accurate to the best of your knowledge. You can just reply back to me in an email instead of sending a hard copy signature. I've also attached 2 other documents pertaining to the operation and maintenance of the combustor. These are referenced in the table. If you have any questions, please call - I'd be happy to meet with you in person.



ROP Compliance
Summary Table Q



2003 Deviations
Summary for EU



Unscheduled
Maintenance 2003 d

Kim Alfonsi
Pfizer Global Research & Development - Ann Arbor
Environmental Affairs & Government Agency Permits
Phone 734-622-2295
Fax 734-622-4912
Email Kim.alfonsi@pfizer.com

Alfonsi, Kim

From: Volstromer, Joseph
Sent: Thursday, February 26, 2004 3:28 PM
To: Alfonsi, Kim
Subject: RE: ROP Compliance Certification 2003 Due 2/27

Kim,

To my knowledge we are complying with all aspects of these requirements for the time applicable in 2003.
Joe

-----Original Message-----

From: Alfonsi, Kim
Sent: Saturday, February 21, 2004 6:52 PM
To: Volstromer, Joseph, Lemon, Michael, Day, Gwendolyn
Cc: Herner, Holly
Subject: ROP Compliance Certification 2003 Due 2/27
Importance: High

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I've attached the table of all permit conditions and our internal audit review. Please review with particular emphasis on your sections (powerhouse in blue and AC in pink). We ask that you sign off that you have reviewed and the information is accurate to the best of your knowledge. You can just reply back to me in an email instead of sending a hard copy signature. I've also attached 2 other documents pertaining to the operation and maintenance of the combustor. These are referenced in the table. If you have any questions, please call - I'd be happy to meet with you in person.

<< File: ROP Compliance Summary Table Q1-Q4 2003 Audit.xls >> << File: 2003 Deviations Summary for EUCOMBUSTOR.doc >> << File: Unscheduled Maintenance 2003.doc >>

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